EXHIBIT H

Г	- Case 3:09-cv	00620-	REP	Document	530-8 File	ed 12/14	//10 Pa g	ı e 2 of₁3	<mark>6 Page∣D</mark> #	14129
ď									Shamos opinion re J-CON	
α									J-CON (per supplemental invalidity defenses)	
×									Shamos Opinion re P.O. WRITER	
_									P.O. WRITER (per interrogatory responses and	
ď	1								DEPEN DENCY	
٥	INVALIDITY ANALYSIS OF JOHNSON ET AL. U.S. PATENTS 6,023,683, 6,055,516, AND 6,505,172	Citations to references are exemplary only and not intended to be exhaustive.	A cell with tan shading indicated content obtained from another 4 cell	A cell with light green shading indicates a claim element that is anticipated by the reference in its column (possibly also asserted to 5 be obvious)	A cell with light yellow shading indicates a claim element that is not asserted to be anticipated by the reference in its column but is obvious	A cell with light blue shading indicates a claim as a whole that is invalid for reasons other than 7 §102 or §103.	A cell with gray shading indicates matter appearing in Lawson interrogatory responses but not adopted by Dr. 8 Shamos.	A cell with rose shading indicates an element or step that is not found in 9 the reference	ASSERTED CLAIMS DEPEN 11 DENCY 12 DENCY 13 DENCY 14 DENCY 14 DENCY 14 DENCY 15 DENCY 15 DENCY 17 DENCY	

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S		Shamos opinion re J-CON	J-CON is an electronic system for use by a prospective buyer to locate and find items to purchase from sources, suppliers or vendors	(Retail) Locating items is disclosed, e.g., at L012360: "PartFinder is J-CON's electronic parts catalog, Use it with Point-of-Sale (POS) to look up the parts a customer wants and put them on the ticket."	Purchasing items is dislosed, e.g., at L0123459 et seq. ("Start the Sale"). (Dealer) Sourcing for inventory is disclosed, e.g., at L0123681 et seq. (Purchasing and Receiving) and, e.g., at L0123964 et seq. (Inventory Information).	Multiple vendors are disclosed: "ORDER BY CODE. If the manufacturers parts are ordered from one vendor (by line) enter "L"	multiple vendors (by subline), enter "S" If you have second and third choices for vendors enter their vendor numbers." L0125080	"Adding and Editing Vendors. Most of your vendors were added when your system was set up. When you add new vendor most prompts you receive are self-explanatory." L0125142	Claim 1 is anticipated by J-CON.				
Δ.		J-CON (per supplemental invalidity defenses)	J-CON is an electronic sourcing system. (L0123423).						J-CON renders claim 1 obvious when combined with the Fisher RIMS system, Doyle, P.O. Writer, SABRE, the Gateway system, or the IBM TV 12 system.				
×		Shamos Opinion re P.O. WRITER	P.O. Writer is an electronic system for use by a prospective buyer to locate and find items to purchase from sources, suppliers or vendors.	Locating items is disclosed at L0127525-30 (Requisitioning manual). Purchasing the located items is disclosed at L0126745-56 et seq. (Purchasing Tutorial).	Multiple vendors are disclosed: "P.O. WRITER PLUS keeps a record of your Vendors in the VENDOR MASTER FILE." L0126731				Claim 1 is anticipated by P.O. Writer.				
٦		P.O. WRITER (per interrogatory responses and	P.O. Writer is an electronic sourcing system. (e.g. L0126506)						P.O. Writer system renders claim 1 obvious when combined with the Fisher RIMS system, Doyle, J-CON, or the IBM TV/2 system.				
А	ASSERTED CLAIMS DENCY		1. An electronic sourcing 1P P. system comprising:						<u>a</u> 80				
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c	n		Shamos opinion re J-CON	To the extent that ePlus contends that this limitation is met by Lawson's accused system, i.e., that restricting a search by vendor number constitutes searching a "separate portion," this limitation is also met by J-CON and Lawson's prior art system. J-CON maintained a database of items. "J-CON's Point-of-Sale/total Recall uses the latest Relational Database (RDB) technology so that even the most inexperienced counterperson can quickly and accurately enter sales and print tickets." L0123499. Different portions of the database could be searched separately. J-CON slos maintained a PartFinder database. L0123658 J-CON further made use of a PartFinder database. "PartSource is a licensed product from CCI that uses Relational Database (RDB) technology to give you price sheet prices and the correct selling price for parts that are not in your JIF." L0123472.	J-CON included mechanisms and screen displays for J-CON discloses a means for entering product information that was descriptive of least partially describes at least one desired item. Line items in the parts database. (L0123613). (desired items) are partially described on a display screen by specifying fields of information, e.g., manufacturer code, part number, list price, unit price and/or cost. L0123471. The "user interface" is the display screen. In PartSource, items can be partially described via wildcards: "With PartSource you can use wild' cards if you do not know the manufacturer or part number. Wild cards are characters-asiterisk and question mark (?) replaces anyone character, and the asterisk (*) replaces zero or more characters." L0123472.
۵	Y		J-CON (per supplemental invalidity defenses)		J-CON included mechanisms and screen displays for entering product information that was descriptive of items in the parts database. (L0123613).
2	۷		Shamos Opinion re P.O. WRITER	To the extent that ePlus contends that this limitation is met by Lawson's accused system, i.e., that restricting a search by vendor number constitutes searching a "separate portion," this limitation is also met by P.O. Writer and Lawson's prior art system. P.O. Writer maintained catalog data in an electronic database (electronic format): "Bayless Stationer publishes a catalogue of office supplies they sell. A very small portion of this catalogue has been pre-loaded in the sample data base." L0126575. P.O. Writer accommodated catalogs of multiple vendors. "You can now buy this item from Best Buy, Bayless. or any other vendor you would like to select." L0126552. The P.O. Writer database could be searched by vendor number, indicating a portion to be searched separately: "Since you haven't received a response from Bayless yet, order from Best Buy: - In the Vendor Number field, type 12345 [ENTER]." L0126552. Catalogs were published by vendors: "Bayless Stationer publishes a catalogue of office supplies they sell." L0126575	The function is disclosed in the reference. See, e.g., L0126944, which has the user entering "CAR" as a partial description of an item. Fields of product information are entered via a catalog screen (user interface): "The FILE DISPLAY screen appears. The TIEM MASTER FILE can be displayed in ITEM NUMBER sequence, DESCRIPTION sequence, or in COMMODITY CODE sequence, or in COMMODITY CODE sequence. Move the cursor to the Item Description sort and display all items whose description sort and display all items whose description as the ast partially describes at least one desired item, as does the item number or commodity code. The display of information is performed by a software module that provides product information describing one of more items.
-	2		P.O. WRITER (per interrogatory responses and	P.O. Writer had an electronic database for storing multiple catalogs in electronic format. (L0127571, L012652 & L0126661-62). As items are added to the Item Master Record, they can be assigned to a particular catalog associated with a particular vendor. (SAP_0803520.) A particular vendor. (SAP_0803520.) A particular vendor selected for searching by entering a CATALOGUE ID. (SAP_0803522-23.) The system may contain multiple CATALOGUE ID'S. (SAP_083522.)	The selected catalogs can be searched by ITEM NUMBER, ITEM DESCRIPTION, COMMODITY CODE, or a portion of these criteria. (SAP_0803523-24.)
	n	MS DENCY		# D & 0	1p
<	₹	ASSERTED CLAIMS		a database containing data relating to items associated with at least two vendors maintained so that selected portions of the database may be searched separately	means for entering product information that at least partially describes at least one desired item
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ASSERTED CLAMS DEPTH ASSERTED CLAMS DEPTH	- Case 3:99 cv 09620 REP Docum	nent 530-8	8 Filed <u>1</u> 2/14/10 Page 5 of 36 Pa
DEPEN			The reference discloses a means for generating a list of desired catalog items that includes at least one search result selected by a said means for searching Desired items returned by the search program are selected for inclusion in an order list as described at L0124915. "You select a part by entering its selection number at the SELECTION field. PART-FINDER then displays the number on vehicle for the part at the QUANTITY field. If you want to sell the quantity displayed, you press <return>. Otherwise, you can enter a different quantity." (3) An order list of selected items and cost data is shown at L0124916. The user interface is a screen that displays the SELECTION field.</return>
DEPEN	J-CON (per supplemental invalidity defenses) J-CON included a search program for matching items in a database in response to the descriptive information entered by the user. (L0123472).		J-CON created list of parts meeting a specific criteria in which a user could select parts and quantities to purchase. (L0123603 & L0123610-11).
DEPEN DENCY P.O. WRITER (per interrogatory responses and terms among selected product catalogs by entering search criteria, including term number, item description, and commodity code, that at least partially describes a desired item. (L0127525 & L0127528). The selected catalogs can be searched by ITEM NUMBER, ITEM DESCRIPTION, COMMODITY CODE, or a portion of these criteria. (SAP_0803523-24.) Items from the catalog screen can be selected for requisition by pressing F7. (L0126948).	rRITER 1 program, 10126941-5.	P.O. Writer enabled a user to search for matching items among selected product catalogs by entering search criteria, including item number, item description, and commodity code, that at least partially describes a desired item. L0127525.	In response to a search, P.O. Writer returns a Jist from which items can be selected. Bearch results are selected by assigning them non-zero quantities and a list of desired catalog items is generated. L0126948. See also Fig.19-7, "Selecting/tems From The Catalogue."
O	P.O. WRITER (per internogatory responses and P.O. Writer enabled a user to search for matching items among selected product catalogs by entering search criteria, including item number, item description, and commodity code, that at least partially describes a desired item. (L0127528 & L0127528). The selected catalogs can be searched by ITEM NUMBER, ITEM DESCRIPTION, COMMODITY CODE, or a portion of these criteria. (SAP_0803523-24.)		P.O. Writer system created a list of items resulting from a search in which a user could enter the quantity desired. (L0126557). Items from the catalog screen can be selected for requisition by pressing F7. (L0126948)
ASSERTED CLAIM! means for searching for match the entered product information in the selected portions of the database least one matching item selected by said means for searching	48		7
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ASSERTED CALANIA GEREN AND CONTROL OF CONTR		Cas	se 3:09-cv-00620-REPDocument 530- {	3 Filed <u>12/14/10 Page 6 of 36 Pagel</u> [
P.O. Witter enabled terms from the catalog screen in the reference discusses building a requisition in the requisition is to be selected for requisition in the pressing F7. The reference discusses building a requisition in the reduction by pressing F7. The reference discusses building a requisition in the reduction by pressing F7. The reference discusses building a requisition rate following steps white a last responsive to a search is being displayed as shown at LOT2750, the best of the requisition in the pressing F7. The reference discusses distribution as the report of the requisition in the upper service of the reduction in the pressing F4. The reference discusses a purchase order to be serviced in responsive to a search is being displayed as shown at LOT2750, the content of the requisition is to be selected in reduction glens to be transferred to a search is being displayed. The reference discusses a purchase order of the requisition is the pressing F4. LOT26651-36. The reference discusses a purchase order or be described in the cliators for element 1d. above and at LOT27631-36. The user causes a purchase order to be created from the requisition in different vendors were split find. The requisition is a described at the requisition is a described at the requisition in different vendors were split find in a equisition to purchase order by vendor. (LOT2697b). Requisitions can also be consoleded or general form requisitions in a described at the requisition and the purchase order by reducing or another purchase order by the pression of the reducing or another purchase order or the purchase order or the consoleded or pasts. Requisitions can also be consoleded or split automatically.	တ	Shamos opinion re J-CON	The reference discloses a means for building a requisition that uses data obtained from said database relating to requisition items on said list of desired catalog items. The reference discloses transferring data relating to selected matching items included on an order list to a requisition module "When you return to Point-Of-Sale from PART-FINDER, J-CON automatically places all parts you selected with PART-FINDER, parts needed by a customer to be generated (built) when the ticket is finalized: "Only when the held ticket is finalized does J-CON process it." L0124797. The ticket is the requisition. The requisition module has access to data in the database: "PartFinder is J-CONs electronic parts catalog. Use it with Poin of-Sale (POS) to look up the parts customer wants and put ther on the ticket." L0123601	The reference discloses a means for processing a requisition to generate purchase orders for requisition items. A pruchase order generation module for generating purchase orders is disclosed at L0125131-3, e.g., "Once you fine-tune the buying instructions that you've set up for J-CON you can let J-CON automatically compute and send POs during End-of-Day compute POs during EOD. You can also set it to automatically transmit POs to vendors who use A-DIS." L0123693 The module has access to the requisition (ticket): "When you compute PO for pofmay or alternate vendor J-CON checks each manufacturer to see which ones should be ordered from the vendor. It then checks every part from each of those manufacturers to see which ones need to be ordered." L01236
The contract of the contract	&	J-CON (per supplemental invalidity defenses)	J-CON enabled a user to select items to add to a requisition (ticket). (L0123606).	J-CON could be configured to process purchase orders manually or automatically. (L0123693-99).
LAIMS DEPEN Base data to to the sing the service of the se	エ	Shamos Opinion re P.O. WRITER		er the tree to-
LAIMS DEPEN Best data to to the sing orders a orders	J.	P.O. WRITER (per interrogatory responses and	2.O. Writer enabled items from the catalog screen to be selected for requisition by pressing F7. L0126948).	9.0. Writer enabled a purchase order to be created toom the requisition list by pressing F4. L0126950). Requisitions including into surchased from different vendors were split into different purchase orders by vendor. (L0126976).

	C	as	3:09 -	cv-006	20 REP	- Docu	nent 530) <u>8</u>	Filed	12/14/	10 Page	7 o	f 36 PageID# 14134
S		Shamos opinion re J-CON	J-CON is an electronic system for use by a prospective buyer to locate and find items to purchase from sources, suppliers or vendors	(Retail) Locating items is disclosed, e.g., at L012360: "PartFinder is J-CON's electronic parts catalog, Use it with Point-of-Sale (POS) to look up the parts a customer wants and put them on the ticket."	Purchasing items is dislosed, e.g., at L0123459 et seq. ("Start the Sale"). (Dealer) Sourcing for inventory is disclosed, e.g., at L0123681 et seq. (Purchasing and Receiving) and, e.g., at L0123964 et seq. (Inventory Information).	Multiple vendors are disclosed: "ORDER BY CODE. If the manufacturers parts are ordered from one vendor (by line) enter "L" multiple vendors (by subline), enter "S" If you have second and	third choices for vendors enter their vendor numbers." LUTSbU8U- "Adding and Editing Vendors. Most of your vendors were added when your system was set up. When you add new vendor most prompts you receive are self-explanatory." L0125142		Claim 1 is anticipated by J-CON.				
&		J-CON (per supplemental invalidity defenses)	J-CON is an electronic sourcing system. (L0123423).						J-CON renders claim 1 obvious when combined with the Fisher RIMS system, King, P.O. Writer, SABRE, or the Gateway system.	Additionally, J-CON renders claim 1 obvious when combined with Doyle and with the Fisher RIMS system, King, P.O. Writer, SABRE, or the Gateway system.	Additionally, J-CON renders claim 1 obvious when combined with the IBM TV/2 system and with the Fisher RIMS system, King, P.O. Writer, SABRE, or the Gateway system.		
エ		Shamos Opinion re P.O. WRITER	P.O. Writer is an electronic system for use by a prospective buyer to locate and find items to purchase from sources, suppliers or vendors.	Locating items is disclosed at L0127525-30 (Requisitioning manual). Purchasing the located items is disclosed at L0126745-56 et seq. (Purchasing Tutorial).	Multiple vendors are disclosed: "P.O. WRITER PLUS keeps a record of your Vendors in the VENDOR MASTER FILE." L0126731				Claim 1 is anticipated by P.O. Writer.				
7	N S	P.O. WRITER (per interrogatory responses and	P.O. Writer is an electronic sourcing system. (e.g. L0126506)						P.O. Writer anticipates claim 1.				
В			4										
A	ASSERTED CLAIMS	12	1. An electronic sourcing system comprising:					34				35	
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ASSERTED CLAIMS GENERAL CONTROL OF CONTROL O		Case	3:09-cv-00620-REP Document	530-8 Filed 12/14/10 Rage 8 of 36 PageID#
DEPEN DENCY PO WRITER (per Interrogatory responses and rate of the lem Master Record, they are added to the lem Master Record, they are added to the lem Master Record are sociated with a particular vendor section of the searched by the particular vendor associated with a particular vendor of multiple CATALOGUE ID'S. (SAP_085522) The P.O. Writer associated as approach are approached a response for searching by entering a search by encourage of the particular vendor constitutes searching a search by encourage and they are a searched to particular vendor constitutes as catalogue of drife supplies by each of the property of the particular vendor constitution and Lavasor's prior and searched as searched for searching by entering a challenge of ATALOGUE ID'S. (SAP_08552.) The P.O. Writer associated a collection of catalogs with particular vendor of catalogs were published by endor number, indicating sportion to be searched by endor number indicating searched sportion to specific calabogs with it first set of pre-determined citerial means may be imitted by CATALOGUE IDs. CAPA_D80552D.) The D.O. Writer accommodated calabogs of mumber and calabogs of mumber and calabogs of mumber and calabogs of mum	σ	Shamos opinion re J-CON	The J-CON system maintained automotive parts information from multiple manufacturers and multiple vendors in an electronic database, including such information as part number, auto make model, and year, engine size, subassembly, product description inventory status, price, manufacturer, distributor(s), and unit of measurement. The J-CON system included the information previously maintained by automotive parts stores in a large collection of printed automotive parts catalogs. "PART-FINDER is J-CONs electronic catalog system that you use together with Point-Of-Sale. You use PART-FINDER to look up parts and Point-Of-Sale to sell them. With PARTFINDER to look up parts and Point-Of-Sale to sell them. With PARTFINDER to look up parts and Point-Of-Sale to sell them. With PARTFINDER to can forget those time consuming searches through manufacture catalogs." L0124897. Changing catalogs is described at L0124922. Therefore, J-CON included a collection of catalogs.	To the extent that ePlus contends the limitation to be met by Lawson's accused system, i.e., that the ability to search for products of specific vendors is sufficient, then the limitation is also met by J-CON and Lawson's prior art system. If "first set of pre-determined criteria" means restriction to specific catalogs, then searches may be limited by manufacturer. "You might want to search for InterChange parts by manufacturery ou can select one or more manufacturers to search by manufacturer press Migs or Enter to leave the GROUP field blan and go to the MFGS TO SEARCH field. Then enter the codes of the manufacturers whose InterChange catalogs you want to search." L0123624.
DEPEN P.O. WRITER (per interrogatory responses and multiple catalogs in electronic database for storing multiple catalogs in electronic format. (L0127571, L0126652 & L0126661-62). As items are added to the Item Master Record, they can be assigned to a particular catalog associated with a particular vendor. (SAP_0603250.) A particular reatiog can be selected for searching by entering a CATALOGUE ID: (SAP_0603522.23.) The system may contain multiple CATALOGUE ID'S. (SAP_083522.) P.O. Writer associated a collection of catalogs with CATALOGUE IDs. (L0127825). As items are added to the Item Master Record, they can be assigned to a particular catalog associated with a particular vendor. (SAP_0803520.)	٣	J-CON (per supplemental invalidity defenses)		
DEPEN 19	ス	Shamos Opinion re P.O. WRITER	To the extent that ePlus contends that this limitation is met by Lawson's accused system, i.e., that restricting a search by vendor number constitutes searching a "separate portion," this limitation is also met by P.O. Writer and Lawson's prior art system. P.O. Writer maintained catalog data in an electronic database (electronic format): "Bayless Stationer publishes a catalogue of office supplies they sell. A very small portion of this catalogue has been pre-loaded in the sample data base." L0126575. P.O. Writer accommodated catalogs of multiple vendors. "You can now buy this item from Best Buy, Bayless, or any other vendor you would like to select." L0126552. The P.O. Writer database could be searched by vendor number, indicating a portion to be searched separately. "Since von haven!"	searched separately: Since you haven treceived a response from Bayless yet, order from Best Buy: - In the Vendor Number field, type 12345 [ENTER]." L0126552. Catalogs were published by vendors: "Bayless Stationer publishes a catalogue of office supplies they sell." L0126575 office supplies they sell." L0126575 may be limited by CATALOGUE IDs. L0127525.
DEPEN 19	7		III	gs with
	B DEPEN	DENCY		
11 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	ASSERTED CLAIMS			

Case 3:09-cv-00620-REP Docur	nent 53<u>0 </u>8 Filed 12/14/10 Page 9 of 36 PageID# 141
Shamos opinion re J-CON If "second set of pre-determined criteria" means restriction to types of items, then items can be searched by entering search criteria, including item number, item description, and commodity occi, that at least partially describes a desired item. "The Part Index is an alphabetized list of parts that gives each parts group and subgroup. There are two ways to find a part in the Part Index. Press Index at the GROUP SUBGROUP or SELECTION field. At SEARCH FOR enter part or all of the part name. The more letters you enter the more accurate the search will be." J-CON also provided for wildcard searching: "When you use wild card and PartSource finds more than one part that matches it displays all the parts along with their descriptions and list prices."	Tyou might want to search for InterChange parts by manufacture of instead of by group. When you search by manufacturer you can select one or more manufacturers to search. To search by manufacturer press Mfgs or Enter to leave the GROUP field blands and go to the MFGS TO SEARCH field. Then enter the codes of the manufacturers whose InterChange catalogs you want to search." L0123624. The purpose of InterChange was to allow selection from among promptive items from multiple sources.
J-CON (per supplemental invalidity defenses) J-CON included mechanisms and screen displays for entering product information that was descriptive of items in the parts database. (L0123613).	
Shamos Opinion re P.O. WRITER If "second set of pre-determined criteria" means restriction to types of items, then items can be searched by entering search criteria, including item number, item description, and commodity code, that at least partially describes a desired item. L0127525 & L0127528.	P.O. Writer enabled a user to select a particular product catalog to search using the CATALOGUE ID (a"vendor identification code"). L0126501 & L012694446. The system may contain multiple CATALOGUE ID'S. SAP_083522. P.O. Writer accommodated catalogs of multiple vendors: "You can now buy this item from Best Buy, Bayless, or any other vendor you would like to select." L012652. The database could be searched by vendor number, indicating a portion to be searched separately: "Since you haven't received a response from Bayless yet, order from Best Buy: - In the Vendor Number field, type 12345 [ENTER]:" L0126552. Searching for "corresponding items" is disclosed because P.O. Writer enabled the user to order a given item from any of several different vendors. L0126552.
P.O. WRITER (per interrogatory responses and P.O. Writer enabled a user to search for matching items among selected product catalogs by entering search criteria, including item number, item escription, and commodity code, that at least partially describes a desired item. (L0127528 & L0127528). The selected catalogs can be searched by ITEM NUMBER, ITEM DESCRIPTION, COMMODITY CODE, or a portion of these criteria. (SAP_0803523-24.)	P.O. Writer enabled a user to select a particular product catalog to search using the CATALOGUE ID. (L0126501 & L0126944-46). The system may contain multiple CATALOGUE ID'S. (SAP_083522.)
a second set of predemined oriteins associated with items from each of said catalogs;	a catalog selection protocol, said catalog selection protocol relying on said first set of predetermined criteria to select less than said entire collection of catalogs, and including matching a vendor identification code with a subset of said collection of catalogs, wherein said subset of said collection of catalogs, wherein said subset of said collection of catalogs from a predetermined vendor and a second catalog from a predetermined third party that is one of a manufacturer and a competing vendor, said predetermined third party seling items corresponding to items in said vendor catalog; and
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S		Shamos opinion re J-CON	J-CON included a search program for selecting specific items. Line items (desired items) are partially described on a point-of-sale screen by specifying fields of information, e.g., manufacture code, part number, list price, unit price and/or cost. L0123471. "Once you've entered the part number of the competitive part yor have J-CON search for the interChange part. You can look up InterChange parts by PartFinder group or by manufacturer." See also '172 1c.	To the extent Plaintiff contends that Lawson's accused system meets this limitation, so does J-CON and Lawson's prior art system. In my opinion, this limitation is not disclosed in the reference, but it would have been obvious to store catalogs of different vendors in separate databases because the catalogs originate from different vendors and would not be provided in the same format. Claim 2 is anticipated by J-CON based on Plaintiff's infiringement contentions. Claim 2 is obvious in view of J-CON.	J-CON enabled a user to search by part number (catalog number). L0123625. J-CON also enabled searching by textual description: "At the SEARCH FOR field you can enter the first letter or letters of the part you want. For example, to see what subgroup spark plugs are in you can enter the first letter or letters of the part you want. For example to see what subgroup spark plugs are in you can enter "S". PART-FINDER displays all parts beginning with that letter or as many as will fit on the screen." Claim 6 is anticipated by J-CON.	
м.		J-CON (per supplemental invalidity defenses)	J-CON included a search program for matching items in a database in response to the descriptive information entered by the user. (L0123472).	Each catalogue in P.O. Writer had a separate catalogue of a separate at separate and the Fisher RIMS system or King. Additionally, J-CON renders claim 2 obvious when system or commodity. For example CATALOGUE ID could be set up combined with SABRE and the Fisher RIMS system or commodity. This catalogue would or contain all stationery items regardless of what when contain all stationery items regardless of what contain 2 is anticipated by P.O. Writer. RIMS system or King. Additionally, J-CON renders claim 2 obvious when composed of combined with the Gateway system and the Fisher RIMS system or King.	J-CON enabled a user to enter part numbers as a basis for searching the database for desired items. (L0123625). J-CON system renders claim 6 obvious when combined with the other cited prior art references as described with respect to claim 1.	
¥		Shamos Opinion re P.O. WRITER	A search engine (program) is described at L0126941-51 in relation to creating a purchase order by searching a catalog. For example, on page L0126944 the user enters "CAR" as a search criterion. The search engine confines its search to the catalogs identified by the first set of criteria, and therefore relies on those criteria. L0127525 & L0127528.	Each catalogue in P.O. Writer had a separate catalog ID and can be considered a separate flatabase. In this example the catalogue is composed of all items for Best Buy Supply. Another method for organizing catalogue may be by item classification or commodity. For example CATALOGUE ID could be set up called STATIONERY. This catalogue would contain all stationery items regardless of what vendor they are purchased from." L0126946	P.O. Writer enabled a user to search for matching items among selected product catalogs by entering search criteria, including item number, item description, and commodity code, that at least partially describes a desired item. L0127525. Claim 6 is anticipated by P.O. Writer under all proposed constructions.	
7		P.O. WRITER (per interrogatory responses and	P.O. Writer enabled a user to search for matching I tems among selected product catalogs by entering I search criteria, including item number, item description, and commodity code, that at least partially describes a desired item. (L0127525).	P.O. Writer renders claim 2 obvious when combined with the Fisher RIMS system or King.	P.O. Writer enabled a user to search for matching F items among selected product catalogs by entering research criteria, including item number, item description, and commodity code, that at least in partially describes a desired item. (L0127525). P.O. Writer anticipates claim 6.	
В	DEPEN					
A	ASSERTED CLAIMS		a search program, said search program relying on said second set of criteria to select specific items from said catalogs determined from said catalog selection protocol.	2. An electronic sourcing system as recited in claim 1, wherein catalogs comprising said collection of catalogs are stored in separate databases.	6. An electronic sourcing system as recited in claim 1, wherein said second set of predetermined criteria includes at least one of a catalog number and item textual information.	
	11	12)	74	88	

- Case	3:09-cv-00620 _e REP Document 530	-8 Filed 12/14/10 Page 11 of 36 PageID# 141
S Shamos opinion re J-CON	3). J-CON is an electronic system for use by a prospective buyer to covered and find items to purchase from sources, suppliers or covendors. (Retail) Locating items is disclosed, e.g., at L012360: "PartFinders is J-CON's electronic parts catalog. Use it with Point-of-Sale (POS) to look up the parts a customer wants and put them on the parts is J-CON's electronic parts at L0123459 et seq. ("Start the Sale"). (Dealer) Sourcing for inventory is disclosed, e.g., at L0123681 et seq. (Purchasing and Receiving) and, e.g., at L0123964 et seq. (Inventory Information). Multiple vendors are disclosed: "ORDER BY CODE. If the manufacturers parts are ordered from one vendor (by line) enter O"L". multiple vendors (by subline), enter "S" if you have second and third choices for vendors enter their vendor numbers." L01250805 third choices for vendors. Most of your vendors were added rewhen your system was set up. When you add new vendor most (prompts you receive are self-explanatory." L0125142	Claim 9 is anticipated by J-CON.
K J-CON (per supplemental invalidity defenses)	J-CON is an electronic sourcing system. (L0123423).	J-CON renders daim 9 obvious when combined with the Fisher system, King or SABRE.
Shamos Opinion re P.O. WRITER	P.O. Writer is an electronic system for use by a prospective buyer to locate and find items to purchase from sources, suppliers or vendors. Locating items is disclosed at L0127525-30 (Requisitioning manual). Purchasing the located items is disclosed at L0126745-56 et seq. (Purchasing Tutorial). Multiple vendors are disclosed: "P.O. WRITER PLUS keeps a record of your Vendors in the VENDOR MASTER FILE." L0126731	Claim 9 is anticipated by P.O. Writer.
P.O. WRITER (per interrogatory responses and	P.O. Writer is an electronic sourcing system. (e.g. L0126506)	P.O. Writer renders claim 9 obvious when combined with the Fisher system, King, or the SABRE system
ASSERTED CLAIMS DENCY	99 P. System comprising:	<u>a. 8 9</u>

ASSERTED CLAMS GENERAL TO CLAMS GENERAL TO THE CONTRICT OF THE
Sharnos Opinion re P.O. WRITER (per Interrugatory responses and Sharnos Opinion re P.O. WRITER (per Interrugatory responses and Sharnos Opinion re P.O. WRITER (per Interrugatory responses and Sharnos Opinion re P.O. WRITER (per Interrugatory responses and Sharnos Opinion re P.O. WRITER (per Interrugatory responses and Sharnos Opinion re P.O. WRITER (per Interrugatory responses and Sharnos Opinion re P.O. WRITER (per Interrugatory responses and section) is met by Lawson's accused system. P.O. Writer had an electronic (man. L. U072757, https://doi.org/10.1072656.1-02.) P.O. Writer man Lawson's prior art system. P.O. Writer and layers so charples the per producted in the sanched by entering a CATALOGUE ID'S. (SAP_08352.2) P.O. Writer accommodated catalogs of multiple CATALOGUE ID'S. (SAP_08352.2) P.O. Writer accommodated catalogs of multiple vendors. "You can now buy his ferm from Best Buy. Bayless. Caralogue has been pre-loaded in the sanched at user to search for matching the vendors." "Our would like to select." (1075657.) P.O. Writer enabled a user to search for matching been manufally and produced a response from Best Buy. Bayless. ca any other vendor you would like to select." (1075657.) P.O. Writer enabled a user to search for matching been been previously been previously been previously been published by vendors. P.O. Writer enabled a user to search for matching been been produced and produced separately. "Since you be vendors." (1075528.) P.O. Writer enabled a user to search for matching been produced and produced separately. "Since you be vendors." (1075528.) P.O. Writer enabled a user to search for matching been produced and
B DEPEN DENCY P.O. WRITER (per internogatory responses and multiple catalogs in electronic database for storing multiple catalogs in electronic format. (L0127571, L012652 & L0126661-62). As items are added to the Item Master Record, they can be assigned to a particular catalog associated with a particular catalog can be selected by a particular catalog can be selected for searching by entering a CATALOGUE ID: (SAP_0803520.) A particular catalog can be selected for searching by entering a CATALOGUE ID: (SAP_0803522.3) The system may contain multiple CATALOGUE ID's: (SAP_083522.) D.O. Writer enabled a user to search for matching items among selected product catalogs by entering search criteria, and commodity code, that at least partially describes a desired item. (L0127525 & L0127528). The selected catalogs can be searched by ITEM NUMBER. ITEM DESCRIPTION, COMMODITY CODE, or a portion of these criteria. (SAP_080353-24.)
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S DEPEN B B B B B B B B B B B B B B B B B B B

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S		Shamos opinion re J-CON	"InterChange is J-CONs electronic cross-reference for parts. You begin InterChange by pressing InterChange from any field on the POS screen except WRRSTAT or from PartFinder." L0123450. "If you have PartFinder you can add InterChange to your J-CON. InterChange cross-references parts in lines you don't stock (called competitive parts) to parts in lines you don't stock interChange parts. InterChange can find an InterChange part even if you do not know the manufacturer or the complete part number of the competitive part." L0123601. "InterChange is an optional product that you use to find an equivalent (or InterChange) part for a competitive part. You start InterChange from POS or from PartFinder." L0123621. "InterChange enters the selected part number in the COMPETITIVE PART field so you can use it to search for cross-references." L0123628.	J-CON had a sophisticated system for keeping track of equivalen items, dividing them into "Replaced Parts," "Substitute Parts," and "Can-Use Parts," 1.0123551. Furthermore, "Alternate Parts," and "Primary and Alternate Manufacturers" are disclosed at L.0123613. A number of different methods of converting among item numbers is disclosed. Substituting an alternate part is described, e.g., at L.0124837.	
œ		J-CON (per supplemental invalidity defenses)			
Υ		Shamos Opinion re P.O. WRITER	This element is disclosed at L0126552, which shows a purchase order history screen listing different catalog numbers (first column) for the same item number (A1000) as listed by different vendors, e.g., Best Buy and Bayless.		
٦		P.O. WRITER (per interrogatory responses and	Items from the catalog screen can be selected for requisition by pressing F7. (SAP_0803526.) Items from a second catalog can be selected for the same requisition by pressing CTRL+F5 to switch catalogs. (SAP_0803526.)		
В	DEPEN		S		
4	ASSERTED CLAIMS	12	a second identification code associated with a second item in a second catalog, said first item and said second item being generally equivalent, and wherein a selection of one identification code from one of said first and second catalogs provides the other identification code from the other identification code from the other of said catalogs.	29	

	Cas	e 3:09-c	: ∨-0062		Docume	ent 530-8	File	d 12/14	/10 Page 1 4	1 of 36 Pagel	D# 14141
v	Shamos opinion re J-CON	J-CON is an electronic system for use by a prospective buyer to locate and find items to purchase from sources, suppliers or vendors	(Retail) Locating items is disclosed, e.g., at L012360: "PartFinder is J-CON's electronic parts catalog. Use it with Point-of-Sale (POS) to look up the parts a customer wants and put them on the ticket."	Purchasing items is dislosed, e.g., at L0123459 et seq. ("Start the Sale"). (Dealer) Sourcing for inventory is disclosed, e.g., at L0123681 et seq. (Purchasing and Receiving) and, e.g., at L0123964 et seq. (Inventory Information).	Multiple vendors are disclosed: "ORDER BY CODE. If the manufacturers parts are ordered from one vendor (by line) enter "L. manultiple vendors (by subline), enter "S" If you have second and third choices for vendors enter their vendor numbers." L0125086	"Adding and Editing Vendors. Most of your vendors were added when your system was set up. When you add new vendor most prompts you receive are self-explanatory." L0125142	Claim 21 is anticipated by J-CON.		In PartSource, items can be partially described via wildcards in data fields: "With PartSource you can use wild' cards if you do not know the manufacturer or part number. Wild cards are characters-asterisk and question mark-that stand for any other character that may appear in the same place. The question mark (?) replaces anyone character, and the asterisk (*) replaces zero or more characters." L0123472.	See also '172 1b.	
œ	J-CON (per supplemental invalidity defenses)	J-CON is an electronic sourcing system. (L0123423).					J-CON renders claim 21 obvious when combined with Claim 21 is anticipated by J-CON the Fisher RIMS system or the IBM TV/2 system.		J-CON included mechanisms and screen displays for entering product information that was descriptive of items in the parts database. (L0123613).		
¥	Shamos Opinion re P.O. WRITER	se by ems to dors.	Locating items is disclosed at L0127525-30 (Requisitioning manual). Purchasing the located items is disclosed at L0126745-56 et seq. (Purchasing Tutorial).	Multiple vendors are disclosed: "P.O. WRITER PLUS keeps a record of your Vendors in the VENDOR MASTER FILE." L0126731			7 #		P.O. Writer's requisition module is the subject of an entire manual, L0127505-601. To the extent the claim requires a "requisition module" to generate criteria for searching, such a function is performed by the P.O. Writer search module using partial criteria as described in connection with '172 1c.	To the extent ePlus accuses Lawson's system of possessing this element, the reference also discloses the element.	
7	P.O. WRITER (per interrogatory responses and	P.O. Writer is an electronic sourcing system. (e.g. L0126506)					P.O. Writer renders claim 21 obvious when combined with the Fisher RIMS system.	Additionally, P.O. Writer renders claim 21 obvious when combined with the J-CON system and the Fisher RIMS system or the IBM TV 12 system.	Items can be searched for by ITEM NUMBER, ITEM DESCRIPTION, COMMODITY CODE, or a portion of these criteria. (SAP_0803523-24.)		
8 G	ASSERTED CLAIMS DENCY 11 12	21. An electronic sourcing 21P system comprising:				C		₹ S IL	a requisition module including data fields, usergenerated criteria entered into at least one of said data fields to generate at least partial criteria corresponding to a desired item;		

Г		Cas	e	2:09 cv-00620-REP Document 530-8	Filed 12/14/10	Page 15 of 36 Page ID	# 14142
	n	Shamos opinion re J-CON		The J-CON system maintained automotive parts information from multiple manufacturers and multiple vendors in an electronic database, including such information as part number, auto make, model, and year, engine size, subassemably, product description, inventory status, price, manufacturer, distributor(s), and unit of measurement. The J-CON system included the information previously maintained by automotive parts stores in a large collection of printed automotive parts catalogs. "PART-FINDER is J-CONs electronic catalog system that you use together with Point-Of-Sale. You use PART-FINDER to look up parts and Point-Of-Sale to sell them. With PARTFINDER you can forget those time consuming searches through manufacturer catalogs" L0124897. Changing catalogs is described at L0124922. Therefore, J-CON included a collection of catalogs.	To the extent that ePlus reads the limitation to be met by Lawson's accused system, i.e., that the ability to search for products of specific vendors is sufficient, then the limitation is also met by J-CON and Lawson's prior art system.	Searches may be limited to a particular manufacturer. "You might want to search for InterChange parts by manufacturer con instead of by group. When you search by manufacturer you can select one or more manufacturers to search. To search by manufacturer press Migs or Enter to leave the GROUP field blankfa and go to the MFGS TO SEARCH field. Then enter the codes of the manufacturers whose InterChange catalogs you want to be search." L0123624.	
c	Z.	J-CON (per supplemental invalidity defenses)	(coordinate the state of the st		The J-CON system enabled a user to enter part numbers as a basis for searching the database for desired items and the results would display additional information. (L0123625).		
2	2	Shamos Opinion re P.O. WRITER		To the extent that ePlus contends that this limitation is met by Lawson's accused system, i.e., that restricting a search by vendor number constitutes searching a "separate portion," this limitation is also met by P.O. Writer and Lawson's prior art system. P.O. Writer maintained catalog data in an electronic database (electronic format): "Bayless Stationer publishes a catalogue of office supplies they sell. A very small portion of this catalogue has been pre-loaded in the sample data base." L0126575. P.O. Writer accommodated catalogs of multiple vendors." You can now buy this item from Best Buy, Bayless, or any other vendor you would like to select." L0126552. The P.O. Writer database could be searched by vendor number, indicating a portion to be searched separately. "Since you haven't received a response from Bayless yet, order from Best Buy: - In the Vendor Number field, type 12345 [ENTER]." L0126552.	. <u>e</u>	bysen may contain multiple CALALOGOE ID'S. SAP_083522.	
-	2	P.O. WRITER (per interrogatory responses and		P.O. Writer had an electronic database for storing multiple catalogs in electronic format. (L0127571, L0126552 & L0126661-62). As items are added to the Item Master Record, they can be assigned to a particular catalog associated with a particular vendor. (SAP_0803520.) A particular catalog can be selected for searching by entering a CATALOGUE ID. (SAP_0803522-23.) The system may contain multiple CATALOGUE ID'S. (SAP_083522.)	bled a user to select a particular to search using the CATALOGUE k.L0126944-46). The system may CATALOGUE ID'S.	(5AF_08354£.)	
٥	DE	DENCY		21b	210		
	T L L L L L L L L L L L L L L L L L L L	ASSEKIED CLAIMS	1 8	a catalog collection searching module, said searching module including a collection of catalogs of items stored in an electronic format,	a catalog selection criteria used to select less than said entire collection,		
		11	13		63	99	

. Case	3:09-sv-00620-REP Docum	nent 530-8 Fi <u>l</u> ed 12 <u>/</u> 14/10 Page 16 of 36 Pag	eID# 14
S Shamos opinion re J-CON	To the extent meaning can be ascribed to this limitation, the search described at L0123609 discloses generation of additional search criteria: "The Part Index is an alphabetized list of parts that gives each parts group and subgroup. There are two ways the find part in the Part Index. Press Index at the GROUP SUBGROUP or SELECTION field. At SEARCH FOR enter part or all of the part name. The more letters you enter the more accurate the search will be. At the GROUP SUBGROUP or SELECTION field type the first 1-4 letters of the part name and press Index. Whichever method you use J-CON displays the index page for parts beginning with the letters you entered. The group and subgroup or subgroups are to the left of the part name."	J-CON generated multiple purchase orders from a single requisition . "The purchasing programs enable you to quickly create purchase orders based on your real needs." L0123423. "You can set up J-CON to automatically compute POs during EOD. You can also set it to automatically transmit POs to vendors who use A-DIS. The POs can go to primary and alternation of multiple purchase orders is disclosed beginning at L0123695, e.g.: "When you ompute a PO for primary or alternation of multiple purchase orders is disclosed beginning at alternate a should be ordered from the vendor. It then checks every part from each of those manufacturers to see which ones need to be ordered."	
R J-CON (per supplemental invalidity defenses)		J-CON generated multiple purchase orders from a single requisition in a number of different ways. (L013617).	
K Shamos Opinion re P.O. WRITER	To the extent meaning can be ascribed to this limitation, the search screen at L0127527 generates additional search-module criteria for data fields, e.g. "BEGINS WITH."	ers mers	
J P.O. WRITER (per interrogatory responses and	P.O. Writer enabled a user to search for matching terms among selected product catalogs by entering limitation, the search screen at L0127527 search criteria, including item number, item description, and commodity code, that at least partially describes a desired item. (L0127525 & L0127528). The selected catalogs can be searched by ITEM NUMBER, ITEM DESCRIPTION, COMMODITY CODE, or a portion of these criteria.	P.O. Writer enabled a purchase order to be created "The P.O. WRITER PLUS Requisitioning from the requisition list by pressing F4. (L0126950), Requisitions including items purchased from different vendors were split into purchased from different vendors were split into equisitions can be full into Purchase orders. "Requisitions can be full into Purchase orders for Requests for Quotes) on a one-to-one basis. Requisition can also be consolidated or split automatically." L0126966	
B DEPEN DENCY	21d	21 _e	
ASSERTED CLAIMS DEPEN	said searching module being used to generate additional search-module criteria for said data fields of said requisition module;	a multiple purchase order generation module, said purchase order generation module generation module creating multiple purchase orders from a single requisition created with said user-generated criteria and said searchmodule criteria;	

П	Ca	se	3:09- _£ v-00620- _R EP	Documen <u>t</u> 530	8 Filed 12/14/10	"Page 17	o f 36 PageID# 14144	
Ø		Shamos opinion re J-CON	InterChange provides the capability to find multiple sources for generally equivalent items: "J-CON uses the manufacturer conversion tables during purchasing receiving automatic part maintenance and store-to-store inquiries. The tables can converty manufacturer codes subline numbers and price codes." Col 124150. "InterChange is an optional product that you use to find an equivalent (or InterChange) part for a competitive part. You start a interChange for a part the first step is to enter the part number in the COMPETITIVE PART field. The competitive part is the part for which you want to find an equivalent part." L0123622.	Determination: "InterChange has a self-reference feature which is helpful to the novice counterperson who might look for an interChange part is found for the change part for a line you carry. If a ninetChange part is	see you carry the competitive part." L0123628.	"If you use different manufacturer codes in your JIF than are in the PART-FINDER database you can cross-reference them. This enables PARTFINDER to find part information." L0124947. "Specifically you can change the manufacturer cross-reference codes you to PART-FINDER codes match the manufacturer codes you use in your JIF." L0124965. "PART-FINDER provides	you with the part information you want using default manufactures codes. However your manufacturer codes may not always matcht the PART-FINDER manufacturer codes. You therefore want to be sure to provide PART-FINDER with a cross-reference to the manufacturer codes you have set up in the JIF." L0124965	
ĸ		J-CON (per supplemental invalidity defenses)		To the extent ePlus accuses Lawson's system The J-CON system used a cross-reference module to of possessing this element, the reference also determine if items are generally equivalent (assuming discloses the element.		The J-CON system used a cross-reference module to determine if items are generally equivalent (assuming meaning can be given to that term). (L0123450 & L0123601).		
Х		Shamos Opinion re P.O. WRITER	This element is disclosed at L0126552, which shows a purchase order history screen listing different catalog numbers (first column) for the same item number (A1000) as listed by different vendors, e.g, Best Buy and Bayless.	To the extent ePlus accuses Lawson's system of possessing this element, the reference also discloses the element.	This element is disclosed at L0126552, which shows a purchase order history screen listing different catalog numbers (first column) for the same item number (A1000) as listed by different vendors, e.g. Best Buy and Bayless. In order to produce this screen, P.O. Writer must possess the claimed "determination system."	To the extent ePlus contends that Lawson's present system meets this limitation, i.e., that linking equivalent items comprises a "determination system." the reference and Lawson's prior art system also disclose the limitation.	This element is disclosed at L0126552, which shows a purchase order history screen listing different catalog numbers (first column) for the same item number (A1000) as listed by different vendors, e.g. Best Buy and Bayless. In order to produce this screen, P.O. Writer must possess the claimed "determination system." An example of the required table is shown on page L0126552, showing catalog numbers for items that are generally	31 one 0
٦		P.O. WRITER (per interrogatory responses and						
В	DEPEN		21	219		21h		
А	ASSERTED CLAIMS		wherein each of at least two catalogs include a generally equivalent item from a different source, said requisition module working in combination with said catalog searching module to determine multiple sources for said item;	wherein said multiple sources is limited by said castalog searching module	according to said user- generated oriterial search-module criteria and a determination system that located items are generally equivalent; and	wherein said determination system includes a cross reference table matching an identification code from a first located item with a second	identification code from a second located item.	
		13		71	47			76

P. D. WRITER (per interragatory responses and Sharmos Opinion ne P.O. WRITER (per interragatory responses and Sharmos Opinion ne P.O. WRITER (per interragatory responses and Sharmos Opinion ne P.O. WRITER (per interragatory responses and Sharmos Opinion ne P.O. WRITER (per interragatory responses and Sharmos Opinion ne P.O. WRITER (per interragatory response recident of the per interragatory response recident of the per interragatory responses and the per interpretation of the per	S	Cas	Shamos opinion re J-CON	u don't stock u don't stock (called election number of election field e selected part ou can use it to also '\$16 element	This limitation has no ascertainable meaning. Nevertheless, parts that are equivalent in the J-CON system are identical unless they are identified as an alternate or replacement part: "When you enter replaced part and the quantity available is larger than the quantity ordered, J-CON displays the replacement part in the programment part in the part of the polyscreen."	L0123485. To the extent Plaintiff alleges this claim to be infringed by Lawson's current syste, claim 22 is anticipated by J-CON.	530-8	Filed 1	J-CON is an electronic system for use by a prospective buyer to locate and find items to purchase from sources, suppliers or vendors	(Retail) Locating items is disclosed, e.g., at L012360: "PartFinder is J-CON's electronic parts catalog. Use it with Point-of-Sale (POS) to look up the parts a customer wants and put them on the title time."	Purchasing items is dislosed, e.g., at L0123459 et seq, ("Start the Sale"), (Dealer) Sourcing for inventory is disclosed, e.g., at 60123681 et seq. (Purchasing and Receiving) and, e.g., at 60123964 et seq. (Inventory Information).	Multiple vendors are disclosed: "ORDER BY CODE. If the 9) manufacturers parts are ordered from one vendor (by line) enter 7	multiple vendors (by subline), enter "S" If you have second and third choices for vendors enter their vendor numbers." L01250800	"Adding and Editing Vendors. Most of your vendors were added ## when your system was set up. When you add new vendor most prompts you receive are self-explanatory." L0125142	145
DENCY P.O. WRITER (per interrogatory responses and sharros Opinion re P.O. WRITER P.O. Writer renders claim 22 obvious when ombined with the Fisher RIMS system renders claim 22 obvious when owners claim 32 obvious when owners claim 32 obvious when owners claim 32 obvious when owners claim 33 obvious when owners claim 34 obvious when owners claim 35 obvious when owners claim 10 obvious and 10 obvious stables of 10 obvious sharp and 10 obvious sharp with 35 obvious sharp 10 obvious 10 obvious sharp 10 obvious 10 obviou	ď	Vessels and Parent Parent Parent VICE Control VICE CONTRO	J-CON (per supplemental invalidity defenses)		-					(Retail) 1 is J-CON 1	Purchas Sale"). (L01236E L01239	Multiple manufac	multiple third cho	"Adding when yo prompts	
PEOPEN DENCY P.O. WRITER (per interrogatory responses and combined with the Fisher RIMS system. Additionally, the P.O. Writer system renders claim 22 obvious when combined with J-CON and the Fisher RIMS system or the IBM TV/2 system. P.O. Writer is an electronic sourcing system. (e.g. 10126506)	х				ppears to have no meaning. has meaning sufficient to 's present system, it is also reference and in Lawson's		All the items have the identical indentification code A1000.	To the extent Plaintiff alleges this claim to be nfringed by Lawson's current system, claim 22 is anticipated by P.O. Writer.	P.O. Writer is an electronic system for use by Japrospective buyer to locate and find items to burchase from sources, suppliers or vendors.	ocating items is disclosed at L0127525-30 Requisitioning manual). Purchasing the ocated items is disclosed at L0126745-56 et seq. (Purchasing Tutonal).	Multiple vendors are disclosed: "P.O. MRITER PLUS keeps a record of your Jendors in the VENDOR MASTER FILE."				
DE NC C	ſ	The state of the s	P.O. WRITER (per interrogatory responses and		s claim d the										
ocated ising:	В								29						
ASSERTEI 11 12 22. An electro system as rec 21, wherein s, determination includes an id includes an id identification clarent of said It items. 29. An electro system compu	A	ASSERTED CLAIMS	21.5		22. An electronic sourcing system as recited in claim 21, wherein said determination system includes an identical identification code for	each of said located items.			29. An electronic sourcing system comprising:						62

S	Ci	Shamos opinion re J-CON	29 is anticipated by J-CON under all proposed	The J-CON system maintained automotive parts information from database, including such information as part number, auto make, model, and year, engine size, subassembly, product description, or inventory status, price, manufacturer, distributor(s), and unit of measurement. The J-CON system included the information previously maintained by automotive parts sories in a large collection of printed automotive parts sories in a large rest part stores in a large solucion of printed automotive parts sories in a large rest part solucion of printed automotive parts catalogs. "PART-FINDER is J-CONs electronic catalog system that you or use together with Point-Of-Sale. You use PART-FINDER to look oup parts and Point-Of-Sale vou use PART-FINDER you can forget those time consuming searches through manufacturer catalogs" L0124897. Changing catalogs is described at L0124922. Therefore, J-CON or included a collection of catalogs.	Filed 12/14/10	To the extent that ePlus contends the limitation to be met by Lawson's accused system, i.e., that the ability to search for products of specific vendors is sufficient, then the limitation is also met by J-CON and Lawson's prior art system. If "first set of pre-determined criteria" means restriction to specific catalogs, then searches may be limited by manufacturer. "You might want to search for Inter-Change parts by manufacturer or or more manufacturer by manufacturer you can select one or more manufacturers to search by manufacturer press Mfgs or Enter to leave the GROUP field blank and go to the MFGS TO SEARCH field. Then enter the codes of the manufacturers whose Inter-Change catalogs you want to search." L0123624.
α.		J-CON (per supplemental invalidity defenses)	J-CON renders claim 29 obvious when combined with Claim 29 is anticipated by J-CON under all proposed the Fisher RIMS system, King, P.O. Writer, SABRE or constructions. the Gateway system. Additionally, J-CON renders claim 29 obvious when	The multi the IBM TV//2 system and the Fisher The multi datal mode inversely must be system and the Fisher The multi datal mode inversely must be solled to the multiple can be system to the multiple can be system.		To the Laws produced as a search of the man is sear
¥		Shamos Opinion re P.O. WRITER		To the extent that ePlus contends that this limitation is met by Lawson's accused system, i.e., that restricting a search by vendor number constitutes searching a "separate portion," this limitation is also met by P.O. Writer maintained catalog data in an electronic database (electronic format): "Bayless Stationer publishes a catalogue of office supplies they sell. A very small portion of this catalogue has been pre-loaded in the sample data base." L0126575. P.O. Writer accommodated catalogs of multiple vendors: "You can now buy this item from Best Buy, Bayless. or any other vendor you would like to select." L0126552.	in error, where radicating a portion to be searched by vendor number, indicating a portion to be searched separately. "Since you haven't received a response from Bayless yet, order from Best Buy in the Vendor Number field, type 12345 [ENTER]." L0126552. Catalogs were published by vendors: "Bayless Stationer publishes a catalogue of office supplies they sell." L0126575	If "first set of pre-determined criteria" means restriction to specific catalogs, then searches may be limited by CATALOGUE IDs. L0127525.
٦		P.O. WRITER (per interrogatory responses and	P.O. Writer renders claim 29 obvious when combined with the Fisher RIMS system, SABRE or J-CON.	P.O. Writer had an electronic database for storing multiple catalogs in electronic format. (L0127571, L0126552 & L0126661-62). As items are added to the Item Master Record, they can be assigned to a particular catalog associated with a particular vendor. (SAP_0803520.) A particular catalog can be selected for searching by entering a CATALOGUE ID. (SAP_0803522-23.) The system may contain multiple CATALOGUE ID'S. (SAP_083522.)		P.O. Writer associated a collection of catalogs with if "first set of pre-determined criteria" means restriction to specific catalogs, then searches may be limited by CATALOGUE IDs. As items are added to the Item Master Record, they can be assigned to a particular catalog associated with a particular vendor. (SAP_0803520.)
В	DEPEN		,	29a		290
A	ASSERTED CLAIMS			a collection of catalogs of items stored in an electronic format;		a first set of predetermined criteria associated with said collection of catalogs;
	7	12 2	2	8	ά	

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S Shamos opinion re J-CON	If "second set of pre-determined criteria" means restriction to types of items, then items can be searched by entering search criteria, including item number, item description, and commodity code, that at least partially describes a desired item. "The Part Index is an alphabetized list of parts that gives each parts group and subgroup. There are two ways to find a part in the Part Index. Press index at the GROUP SUBGROUP or SELECTION field. At SEARCH FOR enter part or all of the part name. The more letters you enter the more accurate the search will be." L0123609. J-CON also provided for wildcard searching: "When you use wild card and PartSource finds more than one part that matches it displays all the parts along with their descriptions and list prices." L0123473.	"You might want to search for InterChange parts by manufacturer for select one or more manufacturers to search. To search by select one or more manufacturers to search. To search by manufacturer press Migs or Enter to leave the GROUP field blank? The manufacturers whose InterChange catalogs you want to search." L0123624. The purpose of InterChange was to allow selection from among poorpetitive items from multiple sources. J-CON had a sophisticated system for keeping track of equivalent items, dividing them into "Replaced Parts," "Substitute Parts," and "Can-Use Parts." L0123551. Furthermore, "Atternate Parts," and "Primary and Alternate Manufacturers," are disclosed at L012361. A number of different methods of converting among the numbers is disclosed. Substituting an alternate part is described, e.g., at L0124837.
R J-CON (per supplemental invalidity defenses)	If "second set of pre-determined criteria" J-CON included mechanisms and screen displays for means restriction to types of items, then items entering product information that was descriptive of can be searched by entering search criteria, items in the parts database. (L0123613). including item number, item description, and commodity code, that at least partially escribes a desired item. L0127525 & L0127528.	
K Shamos Opinion re P.O. WRITER	If "second set of pre-determined criteria" means restriction to types of items, then items ecan be searched by entering search criteria, if including item number, item description, and commodity code, that at least partially describes a desired item. L0127528 & L0127528.	P.O. Writer enabled a user to select a particular product catalog to search using the CATALOGUE ID (a "vendor identification code"). L0126501 & L012694446. The system may contain multiple CATALOGUE ID'S. SAP_083522. P.O. Writer accommodated catalogs of multiple vendors. "You can now buy this item from Best Buy, Bayless. or any other vendor you would like to select." L0126552. The database could be searched by vendor number, indicating a portion to be searched separately: "Since you haven't received a response from Bayless yet, order from Best Buy: - In the Vendor Number field, type 12345 [ENTER]:" L0126552.
J P.O. WRITER (per interrogatory responses and	The P.O. Writer system associated items with oriteria, including item number, item description, and commodity code, that at least partially describes a desired item. (L0127525 & L0127528). The selected catalogs can be searched by ITEM NUMBER, ITEM DESCRIPTION, COMMODITY CODE, or a portion of these criteria. (SAP_0803523-24.)	P.O. Writer enabled a user to select a particular product catalog to search using the CATALOGUE ID. (L0126501 & L0126944-46). The system may contain multiple CATALOGUE ID'S. (SAP_083522.)
DEPEN DENCY	2962	29d
ASSERTED CLAIMS	a second set of predetermined criteria associated with items from each of said catalogs;	a catalog selection protocol, said catalog selection protocol relying on said first set of predetermined criteria to select less than said entire collection of catalogs, and including matching a vendor identification code with a subset of said collection of catalogs, wherein said subset of catalogs includes both a vendor catalog from a predetermined vendor and a second catalog from a predetermined third party.
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Ø		Shamos opinion re J-CON	J-CON included a search program for selecting specific items. Line items (desired items) are partially described on a point-of-sale screen by specifying fields of information, e.g., manufacture code, part number, list price, unit price and/or cost. L0123471. "Once you've entered the part number of the competitive part you have J-CON search for the InterChange part. You can look up InterChange parts by PartFinder group or by manufacturer." L0123623. See also '172 1c.	J-CON uses cross-reference tables to match identification codess "If you use different manufacturer codes in your JIF than are in the PART-FINDER database you can cross-reference them. This enables PARTFINDER to find part information." L0124947. "Specifically you can change the manufacturer codes so the PART-FINDER codes match the manufacturer codes you use in your JIF." L0124965. "PART-FINDER provides you with the part information you want using default manufacturer codes. However your manufacturer codes may not always match the PART-FINDER manufacturer codes. You therefore want to be sure to provide PART-FINDER with a cross-reference to the manufacturer codes you have set up in the JIF." L0124965	"If you have PartFinder you can add InterChange to your J-CON. InterChange cross-references parts in lines you don't stock (called competitive parts) to parts in lines you do stock (called interChange parts)." L0123601. "[T]ype the selection number of the InterChange part you want to use in the SELECTION field then press InterChange. InterPART field so you can use it to search for cross-references." L013628. See also '516 element 9c.
<u>~</u>		J-CON (per supplemental invalidity defenses)	J-CON induded a search program for matching items in a database in response to the descriptive information entered by the user. (L0123472).	J-CON included a cross-reference module. (L0123450 & L0123601).	
¥		Shamos Opinion re P.O. WRITER	A search engine (program) is described at L0126941-51 in relation to creating a purchase order by searching a catalog. For example, on page L0126944 the user enters "CAR" as a search criterion. The search engine confines its search to the catalogs identified by the first set of criteria, and therefore relies on those criteria. L0127525 & L0127528.	To the extent ePlus contends that Lawson's present system meets this limitation, i.e., that linking equivalent items comprises a "determination system." The reference and Lawson's prior art system also disclose the limitation. This element is disclosed at L0126552, which shows a purchase order history screen listing different catalog numbers (first column) for the same item number (A1000) as listed by different vendors, e.g. Best Buy and Bayless. In order to produce this screen, P. O. Writer must possess the claimed "determination system." An example of the required table is shown on page L0126552, showing catalog numbers for items that are generally	
7		P.O. WRITER (per interrogatory responses and	P.O. Writer enabled a user to search for matching tems among selected product catalogs by entering search criteria, including item number, item description, and commodity code, that at least partially describes a desired item. (L0127525 & L0127528). The selected catalogs can be searched by ITEM NUMBER, ITEM DESCRIPTION, COMMODITY CODE, or a portion of these criteria. (SAP_0803523-24.)		
В	DEPEN		296	294	
∢	ASSERTED CLAIMS		a search program, said search program relying on said second set of criteria to select specific litems from said catalogs determined from said catalog selection protocol.	a cross reference table linking a vendor item catalog number from said vendor with an item catalog number from said predetermined third party.	1683 Patent
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ASSERTED CLAMA GENERAL CLAMA CONTINUE AND CO	_	Ca	ase	3:09-(:∨-0062	O _o REP	Docum		Filed :	12/14/10	Page 22	of 36 Pag	eID# 14149
ASSERTED CLAIMS DEPEN P.O. WRITER (per interrogatory responses and sharing an electronic system for use by system comprising. 3. An electronic sourcing system, e.g. P.O. Whiter is an electronic system for use by purchase from sources, suppliers or verdors, suppliers or verdors in the VENDOR MASTER FILE. P.O. Writer anticipates claim 3.	S		Shamos opinion re J-CON		(Retail) Locating items is disclosed, e.g., at L012360: "PartFinder is J-CON's electronic parts catalog. Use it with Point-of-Sale (POS) to look up the parts a customer wants and put them on the ticket."	Purchasing items is dislosed, e.g., at L0123459 et seq. ("Start th Sale"), (Dealer) Sourcing for inventory is disclosed, e.g., at L0123681 et seq. (Purchasing and Receiving) and, e.g., at L0123964 et seq. (Inventory Information).	Multiple vendors are disclosed: "ORDER BY CODE. If the manufacturers parts are ordered from one vendor (by line) enter "L" multiple vendors (by subline), enter "S" If you have second an third choices for vendors enter their vendor numbers " 1 012508	"Adding and Editing Vendors. Most of your vendors were added when your system was set up. When you add new vendor most prompts you receive are self-explanatory." L0125142	Claim 3 is anticipated by J-CON.				
ASSERTED CLAIMS DEPEN P.O. WRITER (per interrogatory responses and sharing Option re-P.O. WRITER (per interrogatory responses and properties buyer to contact and mid-terms to success suppliers or vendors. P.O. Writer san electronic sourcing system (e.g. Pro-Writers is an electronic system for use by purchase) processed at L0122825-30 (Reference in the VENDOR MASTER FILE.** L012650) D.O. Writer anticipates claim 3. P.O. Writer anticipates claim 3.	α		J-CON (per supplemental invalidity defenses)	J-CON is an electronic sourcing system. (L0123423).					J-CON renders claim 3 obvious when combined with the Fisher RIMS system, King, P.O. Writer, SABRE, or the Gateway system.				
ASSERTED CLAIMS DEPEN 3. An electronic sourcing system comprising:	¥		Shamos Opinion re P.O. WRITER		Locating items is disclosed at L0127525-30 (Requisitioning manual). Purchasing the located items is disclosed at L0126745-56 et seq. (Purchasing Tutorial).	Multiple vendors are disclosed: "P.O. WRITER PLUS keeps a record of your Vendors in the VENDOR MASTER FILE." L0126731							
ASSERTED CLAIMS 3. An electronic sourcing system comprising:		PEN	P.O. WRITER (per interrogatory responses and	P.O. Writer is an electronic sourcing system. (e.g. L0126506)									
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ω		Shamos opinion re J-CON	The J-CON system maintained automotive parts information from multiple manufacturers and multiple vendors in an electronic database, including such information as part number, auto make, model, and year, regine size, subassembly, product description, inventory status, price, manufacturer, distributor(s), and unit of measurement. The J-CON system included the information previously maintained by automotive parts stores in a large collection of printed automotive parts catalogs. "PART-FINDER is J-CONs electronic catalog system that you use together with Point-Of-Sale. You use PART-FINDER to look up parts and Point-Of-Sale to sell them. With PARTFINDER you can forget those time consuming searches through manufacturer catalogs. L0124897. Changing catalogs is described at L0124922. Therefore, J-CON included a collection of catalogs.		To the extent that ePlus contends the limitation to be met by Lawson's accused system, i.e., that the ability to search for products of specific vendors is sufficient, then the limitation is also met by JCON and Lawson's prior art system. Under this theory, JCON discloses a means for selecting organized collections to search. "You might want to search for InterChange parts by manufacturer you can select one or more manufacturers to search. To search by manufacturer press Migs or Enter to leave the GROUP field blank and go to the MFGS TO SEARCH field. Then enter the codes of the manufacturers whose InterChange catalogs you want to search." L0123624. The purpose of InterChange was to allow selection from among competitive items from multiple sources.
œ		J-CON (per supplemental invalidity defenses)			
Υ		Shamos Opinion re P.O. WRITER	To the extent that ePlus contends that this limitation is met by Lawson's accused system, i.e., that restricting a search by vendor number constitutes searching a "separate portion," this limitation is also met by P.O. Writer and Lawson's prior art system. P.O. Writer maintained catalog data in an electronic database (electronic format): "Bayless Stationer publishes a catalogue of office supplies they sell. A very small portion of this catalogue has been pre-loaded in the sample data base." L0126575. P.O. Writer accommodated catalogs of multiple vendors."You can now buy this item from Best Buy, Bayless, or any other vendor you would like to select." L0126552. The P.O. Writer database could be searched by vendor number, indicating a portion to be searched separately: "Since you haven't received a response from Bayless yet, order from Best Buy: - In the Vendor Number field, type 12345 [ENTER]:" L0126552.	Catalogs were published by vendors: "Bayless Stationer publishes a catalogue of office supplies they sell." L0126575	The reference discloses a search program, described, e.g., at L0126941-51. The search is disclosed, e.g., at L0126941-5. A portion of the database matching the entered product information can be located, e.g., by specifying a CATALOGUE ID. L0126946. Search results are shown, e.g., at L0126946. A file system is disclosed containing the information to be searched: "The 'foundation' of the P.O. WRITER PLUS system is a group of 13 files, referred to as the Master Files. They contain information about what you buy, who you buy from, who does the buying, etc. Information maintained in these files is used to create a Purchase Order." L0126723
٢		P.O. WRITER (per interrogatory responses and	P.O. Writer had an electronic database for storing multiple catalogs in electronic format. (L0127571, L0126552 & L0126661-62). As items are added to the Item Master Record, they can be assigned to a particular catalog associated with a particular vendor. (SAP_080350.) A particular catalog can be selected for searching by entering a CATALOGUE DI. (SAP_080352-23.) The system may contain multiple CATALOGUE ID'S. (SAP_083522.)		P.O. Writer discloses an interface which enabled a The reference discloses a search program, user to select a particular product catalog to search described, e.g., at L0126941-51. Using the CATALOGUE ID. (L0126501 & L0126944 The search is disclosed, e.g., at L0126941 A portion of the database matching the entered product information can be located e.g., by specifying a CATALOGUE ID. L0126944. Search results are shown. e.g., L0126946. A file system is disclosed containing the information to be searched: "The 'foundation of the P.O. WRITER PLUS system is a gro of 13 files, referred to as the Master Files. They contain information about what you by who you buy from, who does the buying, et information maintained in these files is use to create a Purchase Order." L0126723
B	DENCY		e co		3b
A	ASSERTED CLAIMS		at least two product catalogs containing data relating to items associated with the respective sources;		means for selecting the product catalogs to search;
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S		Shamos opinion re J-CON	The reference discloses a means for searching for search results (a search program) that match the entered product information in the selected portions of the database: "PART-FINDER is J-CON's electronic catalog system that you use paths and Point-Of-Sale. You use PART-FINDER, you can forget those time-consuming searches through manufacturer catalogs. Instead, you can look up parts in seconds with just a few clicks of the keyboard. When you find what your customer wants, PART-FINDER puts the parts on the ticket for you." L0124897. A list of responsive search results is shown at L0124911. A database is disclosed for searching: "You use PART-FINDER Maintenance to customize and update your PART-FINDER database." L0124947	The reference discloses a means for building a requisition that uses data obtained from said database relating to requisition items on said list of desired catalog items. The reference discloses transferring data relating to selected search results (from a browse window) to a requisition module that creates a "purchase request." L0127931. A requisition (called a "supply request" or a "purchase request" in the reference) is built from the selected items in the browse window. L0127970.	
ж		J-CON (per supplemental invalidity defenses)	J-CON included a search program for matching items in a database in response to the descriptive information entered by the user. (L0123472).	J-CON enabled a user to select items to add to a requisition (ticket). (L0123606).	
~		Shamos Opinion re P.O. WRITER	n program, L0126941-5. Ing the be located, LE ID. nown. e.g., at ing the "foundation" in is a group ster Files. what you buy, buying, etc. iles is used	The reference discloses building a requisition that uses data obtained from said database relating to requisition items on said list of desired catalog items. A requisition module performs the following steps. While a list responsive to a search is being displayed, as shown at L0127530, the user can hit F7, which causes data relating to selected matching items to be transferred to a requisition program, which is the module that, in response to F7, creates a requisition. The data is then used to build a requisition, as described in the citations for element 1d, above and at L0127531-36.	
ſ		P.O. WRITER (per interrogatory responses and	P.O. Writer enabled a user to search for matching thems among selected product catalogs by entering described, e.g., at L0126941-51. search criteria, including them number, item partially describes a desired item. (L0127525 & A portion of the database matching the scribes a desired item. (L0127525 & A portion of the database matching the scribes a desired item. (L0127528). The selected catalogs can be searched by ITEM NUMBER, ITEM DESCRIPTION, COMMODITY (CODE, or a portion of these criteria. (SAP_0803523-24.) A file system is disclosed, e.g., at L0126946. L0126946. Contain information about very ontain information about very ontain information about very ontain information about very overate a Purchase Order." L01012694.	P.O. Writer system created a list of items resulting from a search in which a user could enter the quantity desired. (L0126557). Items from the catalog screen can be selected for requisition by pressing F7. (L0126948)	
В			e e e e e e e e e e e e e e e e e e e	PE	
A	ASSERTED CLAIMS		means for searching for matching items among the selected product catalogs;	means for building a requisition using data relating to selected matching items and their associated source(s);	
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DEPEN DENCY P.O. WRITER (per interrogatory responses and from the requisition list by pressing F4. (L0126950). Requisitions including items purchased from different vendors were split into different purchase orders by vendor. (L0126976). Writer system, the vendor listed on the P.O. Writer system, the vendor listed on the requisition could be automatically converted to different vendors. (L012976-80).	Shamos opinion re J-CON The reference discloses a means for processing a requisition to generate purchase orders for requisition items. A pruchase order generation module for generating purchase orders is disclosed at L0125131-3, e.g., "Once you fine-tune the buying instructions that you've set up for J-CON you can let J-CON automatically compute and send POs during End-of-Day EOD." L0125131. "You can also set it to automatically compute POs during EOD. You can also set it to automatically compute POs during EOD. You can also set it to automatically compute PO for pdrinay or alternate vendor J-CON checks each manufacturer to see which ones should be ordered from the vendor. It then checks every part from each of those manufacturers to see which ones need to be ordered." L01236	The reference discloses a means for converting data relating to selected matching item and an associated source to data relatir to an item and a different source.	To the extent that ePlus contends that UNSPSC codes in Lawson's accused system designate "generally equivalent" item this limitation is also disclosed in J-CON and in Lawson's prior system.	The reference discloses maintaining a cross-reference table (no catalog database) or file identifying cross-referenced items: "InterChange is an optional product that you use to find an equivalent (or InterChange) part for a competitive part. You star InterChange from POS or from PartFinder." L0123621. J-CON uses cross-reference tables to match identification codes: "If you use different manufacturer codes in your JIF than are in the PAI FINDER database you can cross-reference them. This enables PARTFINDER to find part information." L0124947.	
DEPEN DENCY P.O. WRITER (per interrogatory responses and from the requisition list by pressing F4. (10126950). Requisitions including items purchased from different vendors were split into different purchased from different vendor. (L0126976). Writer system, the vendor listed on the P.O. Writer system, the vendor listed on the requisition could be automatically converted to different vendors. (L012976-80).	J-CON (per supplemental invalidity defenses) J-CON could be configured to process purchase orders manually or automatically. (L0123693-99).	The J-CON system located interchangeable part from different catalogs are associated with a "competitive part number" in the cross-referencing module	InterChange. (L0123625).		
DEPEN 3e 3e	Shamos Opinion re P.O. WRITER The reference discloses a purchase order generation module operating on a computer system having access to the requisition. The user causes a purchase order to be generated from a requisition at least when the user enter "p" or "U" as described at L0127535 to transmit the requisition to Purchasing. P.O. Writer enabled a purchase order to be created from the requisition list by pressing F4. L0128950. Generating purchase orders from requisitions is also shown at L0126969. Requisitions is also shown at L0126969. Requisitions is also shown at L0126969.	purchase orders by vendor. L0126976. "Requisitions can be turned into Purchase Orders (or Requests for Quotes) on a one-to-one basis. Requisitions can also be consolidated or split automatically." L0126966. To the extent ePlus accuses Lawson's system of possessing this element, i.e. through the use of UNSPSC codes, the reference and			Cross-referenced items and identical items are shown in the table at L0126552
MASSERTED CLAIMS DEPEN means for processing the requisition to generate orders for the selected matching items; and matching items; and different source.	P.O. WRITER (per interrogatory responses and P.O. Writer enabled a purchase order to be created from the requisition list by pressing F4. (L0126950). Requisitions including items purchased from different vendors were split into different purchase orders by vendor. (L0126976).	During Purchase Order generation on the P.O. Writer system, the vendor listed on the requisition could be automatically converted to different	vendors. (L012976-80).		
ASSERTED CLAIMS means for processing the requisition to generate orders for the selected matching items; and related to a selected matching items; and associated source to data relating to an item and a different source.	DE D	ਲ			
1	ASSERTED CLAIMS means for processing the requisition to generate one or more purchase orders for the selected matching items; and		associated source to data relating to an item and a different source.		

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Ø	Shamos opinion re J-CON	"If you have PartFinder you can add InterChange to your J-CON. InterChange cross-references parts in lines you don't stock (called competitive parts) to parts in lines you do stock (called InterChange parts)." L0123601.	"ITIype the selection number of the InterChange part you want took use in the SELECTION field then press InterChange. InterChange enters the selected part number in the COMPETITIVE PART field so you can use it to search for cross-references." L013628.	J-CON is an electronic system for use by a prospective buyer to locate and find items to purchase from sources, suppliers or vendors	(Retail) Locating items is disclosed, e.g., at L012360: "PartFinder is J-CON's electronic parts catalog. Use it with Point-of-Sale (POS) to look up the parts a customer wants and put them on the ticket."	Purchasing items is dislosed, e.g., at L0123459 et seq. ("Start that Sale"). (Dealer) Sourcing for inventory is disclosed, e.g., at L0123681 et seq. (Purchasing and Receiving) and, e.g., at L0123964 et seq. (Inventory Information).	Multiple vendors are disclosed: "ORDER BY CODE. If the manufacturers parts are ordered from one vendor (by line) enter " "	multiple vendors (by subline), enter "S" If you have second and third choices for vendors enter their vendor numbers." L0125080	"Adding and Editing Vendors. Most of your vendors were added when your system was set up. When you add new vendor most prompts you receive are self-explanatory." L0125142	Claim 6 is anticipated by J-CON.	
α.	J-CON (per supplemental invalidity defenses)			J-CON is an electronic sourcing system. (L0123423).						The J-CON system anticipates claim 6.	
エ	Shamos Opinion re P.O. WRITER			P.O. Writer is an electronic system for use by a prospective buyer to locate and find items to purchase from sources, suppliers or vendors.	Locating items is disclosed at L0127525-30 (Requisitioning manual). Purchasing the located items is disclosed at L0126745-56 et seq. (Purchasing Tutorial).	Multiple vendors are disclosed: "P.O. WRITER PLUS keeps a record of your Vendors in the VENDOR MASTER FILE."					
7	P.O. WRITER (per interrogatory responses and			P.O. Writer is an electronic sourcing system. (e.g. L0126506)						The P.O. Writer system anticipates claim 6.	
В	DENCY			6P							
A	ASSERTED CLAIMS	2		6. An electronic sourcing system comprising:						116	

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DEPEN P.O. WRITER (per interrogationy responses and percent detabase for storing multiple catalogs in electronic database for storing multiple catalogs in electronic database for storing multiple catalogs as netertonic database for storing. As terms are added to the term Master Record, they can be assigned to a particular catalog and associated with a particular catalog and associated with a particular catalog and associated with a particular catalog as	Ø	Shamos opinion re J-CON	The J-CON system maintained automotive parts information from multiple manufacturers and multiple vendors in an electronic database, including such information as part number, auto make model, and year, engine size, subassembly, product description inventory status, price, manufacturer, distributor(s), and unit of measurement. The J-CON system included the information previously maintained by automotive parts stores in a large collection of printed automotive parts catalogs. "PART-FINDER is J-CONs electronic catalog system that you use together with Point-Of-Sale. You use PART-FINDER to look up parts and Point-Of-Sale to sell them. With PARTFINDER to you can forget those time consuming searches through manufacture catalogs. Changing catalogs is described at L0124922. Therefore, J-CON included a collection of catalogs.	
DEPEN P.O. WRITER (per interrogatory responses and percent detabase for storing mutities catalogs as nelectronic dratabase for storing mutities catalogs as nelectronic comat. (10/12757). Imitation is met by Lawson's accused system, 10/126651-62). P.O. Writer and a electronic dratabase for storing a search by vendor number constitutes searching a 'separate portion,' this imitation is also met by P.O. Writer and Lawson's prior at system. (SAP 0605220.20.1) The system may contain "Eayless Stationer publishes a catalogate of direct supplies they search of percent and the catalog as the electronic format). D. (SAP 0605220.22.3) The system may contain "Eayless Stationer publishes a catalogate of direct supplies they search of percent and the same percent of this catalogue has been percented in the same percented for searching by entering a CAYALOGUE 10'S. (SAP-063522.) D. O. Writer enabled a user to search for matching may be searched by reform the catalogue has been percented and percented separately. "Since you like to select," L072657. P.O. Writer enabled a user to search for matching may be searched by reform the vendor you would like to select," L072657. P.O. Writer accommodated catalogue of the searched from Best Buy, Bayless or any other vendor you would like to select," L072657. P.O. Writer accommodated catalogue of the select or to 1072691. The selected catalogue of the select or touch catalogue of diffice supplies they sell a least or any other vendor you would like to select." L072657. The selected catalogue of the real least is any or of the catalogue of of the c	α	J-CON (per supplemental invalidity defenses)	The J -CON system includes a database of items from both primary and alternative manufacturers. (L0123613).	J-CON included a search program for matching items in a database in response to the descriptive information entered by the user. (L0123472).
DEPEN DENCY P.O. WRITER (per interrogatory responses and multiple catalogs in electronic database for storing multiple catalogs in electronic format. (L012/571, L012652 & L0126661-62). As items are added to the Item Master Record, they can be assigned to a particular catalog associated with a particular catalog can be selected for searching by entering a CATALOGUE ID: (SAP_0803520.) A particular catalog can be selected for searching by entering as cordered with a particular catalog can be selected for searching product catalogs as CATALOGUE ID: (SAP_0803522.33.) The system may contain multiple CATALOGUE ID'S. (SAP_083522.) P.O. Writer enabled a user to search for matching terms among selected product catalogs by entering search criteria, including item number, item describtion, and commodity code, that at least partially describes a desired item. (L0127525 & L0127529.) The selected catalogs can be searched by ITEM NUMBER; ITEM DESCRIPTION, COMMODITY CODE, or a portion of these criteria. (SAP_080353-24.)	У	Shamos Opinion re P.O. WRITER	in the control or the	program, 10126941-5. 10126941-5. 10126941-5. 1026723 1026723
		P.O. WRITER (per interrogatory responses and	P.O. Writer had an electronic database for storing multiple catalogs in electronic format. (L0127571, L012652 & L0126661-62). As items are added to the Item Master Record, they can be assigned to a particular catalog associated with a particular vendor. (SAP_0803520.) A particular vendor. (SAP_0803520.) A particular y catalog can be selected for searching by entering a CATALOGUE ID. (SAP_0803522-23.) The system may contain multiple CATALOGUE ID'S. (SAP_083522.)	P.O. Writer enabled a user to search for matching items among selected product catalogs by entering search criteria, including item number, item description, and commodity code, that at least partially describes a desired item. (L0127525 & L0127528). The selected catalogs can be searched by ITEM NUMBER, ITEM DESCRIPTION, COMMODITY CODE, or a portion of these criteria. (SAP_0803523-24.)
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	Ca	se	3:09-cv-00620-REP Doc	ument 530-8 Filed 12/14 <u>/</u> 10 Page 28
S		Shamos opinion re J-CON	The reference discloses a means for building a requisition that uses data obtained from said database relating to requisition items on said list of desired catalog items. The reference discloses transferring data relating to selected search results (from a browse window) to a requisition module that creates a "purchase request." L0127931. A requisition (called a "supply request" or a "purchase request" in the reference) is built from the selected items in the browse window. L0127970.	The reference discloses a means for processing a requisition to generate purchase orders for requisition items. A pruchase order generation module for generating purchase orders is disclosed at L0125131-3, e.g., "Once you fine-tune the buying instructions that you've set up for J-CON you can let J-CON automatically compute and send POs during End-of-Day EOD." L0125131. "You can set up J-CON to automatically transmit POs during EOD. You can also set it to automatically transmit POs to vendors who use A-DIS." L0123693 The module has access to the requisition (ticket): "When you compute PO for pdmajy or alternate vendor J-CON checks each manufacturer to see which ones should be ordered from the wendor. It then checks every part from each of those manufacturers to see which ones need to be ordered." L0123699
R		J-CON (per supplemental invalidity defenses)	J-CON enabled a user to select items to add to a requisition (ticket). (L0123606).	J-CON could be configured to process purchase orders manually or automatically. (L0123693-99).
Υ		Shamos Opinion re P.O. WRITER	The reference discloses building a requisition that uses data obtained from said database relating to requisition items on said list of desired catalog items. A requisition module performs the following steps. While a list responsive to a search is being displayed, as shown at L0127530, the user can hit F7, which causes data relating to selected matching items to be transferred to a requisition program, which is the module that, in response to F7, creates a requisition. The data is then used to build a requisition, as described in the citations for element 1d, above and at L0127531-36.	er the same of the
ſ		P.O. WRITER (per interrogatory responses and	P.O. Writer system created a list of items resulting from a search in which a user could enter the quantity desired. (L0126557). Items from the catalog screen can be selected for requisition by pressing F7. (L0126948)	P.O. Writer enabled a purchase order to be created from the requisition list by pressing F4. generation module operating on a comput generation inducing items purchased from different vendors were split into different purchase orders by vendor. (L0126976). The user causes a purchase order to be generated from a requisition at least where user enter "P" or "U" as described at L0127535 to transmit the requisition to Purchasing. P.O. Writer enabled a purchase order to be created from the requisition list by pressin from requisitions is also shown at L012691 Requisitions can be turned into Purchase Orders (or Requests for Quotes) on a one one basis. Requisitions can also be consolidated or split automatically."
В	S DENCY		99	DO 0
A	ASSERTED CLAIMS DEPEN		means for building a requisition using data relating to selected matching items and their associated source(s);	means for processing the requisition to generate one or more purchase orders for the selected matching items; and
	11	12	<u> </u>	122

Cas		l <mark>eૃd 12/14/1ૃ0_{કુ કુ}Page 2</mark> ૬	of 36 PageID# 1
S Shamos oninion early S	The reference disclesselected matching it to an item and a diffication of the action o	"If you have PartFinder you can add InterChange to your J-CON InterChange cross-references parts in lines you don't stock (called competitive parts) to parts in lines you do stock (called linterChange parts)." L0123601. [TIJype the selection number of the InterChange part you want to use in the SELECTION field then press interChange. InterChange enters the selected part number in the COMPETITIVE PART field so you can use it to search for cross-references." L013628. See also '516 element 9c.	The reference discloses a method. Claim 26 is anticipated by J-CON, as shown below.
R LCON (ner sunplemental invalidity defenses)	The J-CON system located interchangeable part from different catalogs are associated with a "competitive part number" in the cross-referencing module InterChange. (L0123625).		The J-CON system renders daim 26 obvious when combined with the Fisher RIMS system, King, P.O. Writer, SABRE, or the Gateway system. Additionally, the J-CON system renders claim 26 obvious when combined with Doyle and the Fisher RIMS system, King, P.O. Writer, SABRE, or the Gateway system.
K Shamos Oninion re P.O. WRITER	is accuses Lawson's system delement, i.e. through the ordes, the reference and system also disclose the sciosed at L0126552, which contains a screen listing to the ristory screen listing unders (first column) for the ristory as lested by e.g. Best Buy and Bayless. e this screen, P.O. Writer calmed "determination on the of the required table is 7126552, showing catalog ithat are generally items and identical items able at L0126552.		The reference discloses a method. Claim 26 is anticipated by P.O. Writer, as v shown below.
J P.O. WRITER (ner intermodatory responses and	During Purchase Order generation on the P.O. Writer system, the vendor listed on the requisition could be automatically converted to different vendors. (L012976-80).		The P.O. Writer system anticipates claim 26.
DEPEN DENCY	99		26P T
ASSERTED CLAIMS 17	means for converting data related to a selected matching item and an associated source to data relating to an item and a different source.	178	26. A method comprising the steps of:

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Ø	Shamos opinion re J-CON	The J-CON system maintained automotive parts information from multiple manufacturers and multiple vendors in an electronic database, including such information as part number, auto make, model, and year, engine size, subassemably, product description, inventory status, price, manufacturer, distributor(s), and unit of measurement. The J-CON system included the information previously maintained by automotive parts stores in a large collection of printed automotive parts catalogs. "PART-FINDER is J-CONs electronic catalog system that you use together with Point-Of-Sale. You use PART-FINDER to look up parts and Point-Of-Sale to sell them. With PARTFINDER to look up parts and Point-Of-Sale to sell them. With PARTFINDER you can forget those time consuming searches through manufacturer catalogs." L0124897. Changing catalogs is described at L0124922. Therefore, J-CON included a collection of catalogs.		To the extent that ePlus reads the limitation to be met by Lawson's accused system, i.e., that the ability to search for products of specific vendors is sufficient, then the limitation is also met by J-CON and Lawson's prior art system. Searches may be limited to a particular manufacturer. "You might want to search for InterChange parts by manufacturer or instead of by group. When you search by manufacturer you can't select one or more manufacturers to search by manufacturer press Migs or Enter to leave the GROUP field blanks and go to the MFGS TO SEARCH field. Then enter the codes of the manufacturers whose InterChange catalogs you want to search." L0123624.
æ	J-CON (per supplemental invalidity defenses)			
Х	Shamos Opinion re P.O. WRITER	To the extent that ePlus contends that this limitation is met by Lawson's accused system, i.e., that restricting a search by vendor number constitutes searching a "separate portion," this limitation is also met by P.O. Writer and Lawson's prior art system. P.O. Writer maintained catalog data in an electronic database (electronic format): "Tayless Stationer publishes a catalogue of office supplies they sell. A very small portion of this catalogue has been pre-loaded in the sample data base." L0126575. P.O. Writer accommodated catalogs of multiple vendors. "You can now buy this item from Best Buy, Bayless, or any other vendor you would like to select." L0126552. The P.O. Writer database could be searched by vendor number, indicating a portion to be searched separately. "Since you haven't received a response from Bayless yet, order from Best Buy: - In the Vendor Number field, type 12345 [ENTER]:" L0126552.	Catalogs were published by vendors: "Bayless Stationer publishes a catalogue of office supplies they sell." L0126575	P.O. Writer enabled a user to select a particular product catalog to search using the CATALOGUE ID (a "vendor identification code"). L0126501 & L0126944-46. The system may contain multiple CATALOGUE ID'S. SAP_083522. P.O. Writer accommodated catalogs of multiple vendors: "You can now buy this item from Best Buy, Bayless, or any other vendor you would like to select." L0126552. See also '516 1d.
	P.O. WRITER (per interrogatory responses and	P.O. Writer had an electronic database for storing multiple catalogs in electronic format. (L0127571, L0126552 & L0126661-62). As items are added to the Item Master Record, they can be assigned to a particular catalog associated with a particular vendor. (SAP_0803520.) A particular catalog can be selected for searching by emering a CATALOGUE ID. (SAP_080352-23.) The system may contain multiple CATALOGUE ID'S. (SAP_083522.)		P.O. Writer discloses an interface which enabled a P.O. Writer enabled a user to select a user to select a particular product catalog to search particular product catalog to search using using the CATALOGUE ID. (L0126501 & L0126944 ATALOGUE ID (a "vendor identification code"). L0126501 & L012694444. The system may contain multiple CATALOGU ID'S. SAP_083522. P.O. Writer accommodated catalogs of multiple vendors: "You can now buy this if from Best Buy, Bayless, or any other venry you would like to select." L0126552. See also '516 1d.
B DEPEN DENCY		76a		26b
ASSERTED CLAIMS		maintaining at least two products catalogs on a database containing data relating to items associated with the respective sources;		selecting the product catalogs to search;
7	13 2		133	135

- Case	2 3:09-cv-00620-REP - Document 5	i30-8 Filed 12/14/10 Page 31 of 36 P a	igeID# 1
S Shamos opinion re J-CON	"The Part Index is an alphabetized list of parts that gives each parts group and subgroup. There are two ways to find part in the Part Index. Press Index at the GROUP SUBGROUP or SELECTION field. At SEARCH FOR enter part or all of the part name. The more eleters you enter the more accurate the search will be. At the GROUP SUBGROUP or SELECTION field type method you use J-CON displays the index page for parts beginning with the letters you entered. The group and subgroup or subgroups are to the left of the part name." L0123609.	The reference discloses transferring data relating to selected matching items to a requisition program: "When you return to Point-Of-Sale from PART-FINDER, J-CON automatically places all parts you selected with PART-FINDER on a ticket." L0124919. The ticket causes a requisition for parts needed by a customer to be generated (built) when the ticket is finalized: "Only when the held ticket is finalized does J-CON process it." L0124797. See also '172 1e, '683 3d.	
R J-CON (per supplemental invalidity defenses)	J-CON included a search program for matching items in a database in response to the descriptive information entered by the user. (L0123472).	J-CON enabled a user to select items to add to a requisition (ticket). (L0123606).	
K Shamos Opinion re P.O. WRITER	L0126941-5. L0126941-5. ng the be located, ln ID. nown. e.g., at 'foundation' m is a group ster Files. what you buy, lies is used 126723	P.O. Writer enabled a user to search for matching items among selected product catalogs by entering search criteria, including item number, item description, and commodity code, that at least partially describes a desired item. L0127525. The reference discloses building a requisition but uses data obtained from said database relating to requisition items on said list of desired catalog items. A requisition module performs the following steps. While a list responsive to a search is being displayed, as shown at L0127530, the user can hit F7, which causes data relating to selected matching items to be transferred to a requisition program, which is the module that, in response to F7, creates a requisition. The data is then used to build a requisition, as described in the citations for element 1d, above and at L0127531-36. See also '172 1e, '683 3d.	
J P.O. WRITER (per interrogatory responses and	P.O. Writer enabled a user to search for matching them among selected product catalogs by entering described, e.g., at L0126941-51. search criteria, including item number, item describes a desired item. (L0127525 & A portion of the database match partially describes a desired item. (L0127525 & A portion of the database match entered product information can e.g., by specifying a CATALOGI. L012694. Search results are st NUMBER, ITEM DESCRIPTION, COMMODITY (SAP_0803523-24.) A file system is disclosed contain information about value from a pour to who you buy from, who does the information maintained in these information maintained in the properties of the maintained in the properties in	P.O. Writer system created a list of items resulting from a search in which a user could enter the quantity desired. (L0126557). Items from the catalog screen can be selected for requisition by pressing F7. (L0126948)	
DEPEN DENCY	29 _C	799 J	
ASSERTED CLAIMS	searching for matching items among the selected product catalogs;	building a requisition using data relating to selected matching items and their associated source(s);	

	. (Cas	se	3:09-cv-00620-REP_Dgcument 5	30-8 	32 of 36 PageID# 14159
S		Shamon anining to 1 COM	Signification opinion to a constant	J-CON generated multiple purchase orders from a single requisition. "The purchasing programs enable you to quickly create purchase orders based on your real needs." L0123423. "You can set up J-CON to automatically compute POs during COD. You can also set it to automatically transmit POs to vendors who use A-DIS. The POs can go to primary and alternation of whom you have set up PO control files in Function 7.7." L0123693. Generation of multiple purchase orders is disclosed beginning at TI L0123695, e.g.: "When you compute a PO for primary or alternate vendor J-CON checks each manufacturer to see which ones should be ordered from the vendor. It then checks every one should be ordered from the vendor. It then checks every one should be ordered from the vendor. It then checks every to are from each of those manufacturers to see which ones need to be ordered."	"In POS you can check a stocking part's available quantity, stock quantity, and price levels With inventory inquiry, you can check stocking parts prices and availability." L0125060. The steps of determining whether a matching item is in inventory are steps of determining whether a matching item is in inventory are shown at L0125060. See also "Warehouse inquiry" at L0125061. "JIF Inquiry gives you inventory information about parts in your JIF. You begin JIF Inquiry by pressing JIF Inquiry from any field on the POS screen except WRKSTAT." L0123450. "Warehouse Inquiry gives you inventory information about parts at your serving warehouse. You begin Warehouse Inquiry by pressing <pre>-Whise Inquiry> from any field on the POS screen detail starting at L0123541.</pre>	The reference discloses a method. Claim 28 is anticipated by J-CON, as shown below.
~		I COM Voor auspalamantal isualiditu dofanaaa	J-CON (pel supplementa myandry delenses)	J-CON could be configured to process purchase orders manually or automatically. (L0123693-99).	"The Inventory Control Module allows you to track on-hand Inventory balances capture and whether and how many of a particular item was report usage history and automatically generate Re-order Analysis as often as you like." L0126633. The Inventory Control module is the subject of an entire manual at L0126148-395.	The J-CON system renders claim 28 obvious when combined with the Fisher RIMS system, King, P.O. Writer, SABRE, or the Gateway system. Additionally, the J-CON system renders claim 28 obvious when combined with Doyle and the Fisher RIMS system. King, P.O. Writer, SABRE, or the Gateway system. Additionally, the J-CON system renders claim 28 obvious when combined with the IBM TVI2 system and the Fisher RIMS system, Doyle, P.O. Writer, SABRE, or the Gateway system.
¥		Champe Onining of Molted	Statios Opinol le P.C. WRIER	e e e e c c c c c c c c c c c c c c c c	"The Inventory Control Module allows you to track on-hand Inventory balances capture and report usage history and automatically generate Re-order Analysis as often as you like." L0126633. The Inventory Control module is the subject of an entire manual at L0126148-395.	The reference discloses a method. Claim 28 is anticipated by P.O. Writer, as shown below.
7		D.O. WDITED (not intermediate reconstruction)	r.O. Walter (be interrogatory responses and	F.O. Writer enabled a purchase order to be created. The reference discloses a purchase order from the requisition list by pressing F4. (L0126950). Requisitions including items purchased from different vendors were split into different purchase orders by vendor. (L0126976). Precision of the requisition at least when user enter "P" or "U" as described at L0127355 to transmit the requisition to Purchasing. P.O. Writer enabled a purchase order to be created from the requisition list by pressing F4. L0126950. Generating purchase order from requisitions including items purchased from frequisitions including items purchased from frequisitions can be turned into Purchase Orders (or Requisitions can be turned into Purchase Orders) on a one one basis. Requisitions can also be consolidated or split automatically." L0126960.	P.O. Writer included an inventory Control Module that enabled tracking of on-hand inventory balances. (L0126633).	The P.O. Writer system anticipates claim 28.
В	DEPEN	DENCY			200	28P
A	ASSERTED CLAIMS			processing the requisition to generate one or more purchase orders for the selected matching items; and	determining whether a selected matching item is available in inventory.	28. A method comprising the steps of:
		_	13	24		4

ASSERTED CLAIMS GERM TO WORTE TO WHAT THE CONTROL TO WAS CONTROL TO THE CONTROL THE CONTR	- C e	ase	<u> </u>	Filed 12/14/10 Page 33 of 36 Page	D# 141
ASSERTED CLAIMS DEPEN P. O. WRITER (per interrogatory responses and planes when the area of the control deathers of the contr	·ν	Shamos opinion re J-CON	The J-CON system maintained automotive parts information from multiple manufacturers and multiple vendors in an electronic database, including such information as part number, auto mask model, and year, engine size, subassembly, product description inventory status, price, manufacturer, distributor(s), and unit of measurement. The J-CON system included the information previously maintained by automotive parts stores in a large collection of printed automotive parts catalogs. "PART-FINDER is J-CONs electronic catalog system that you use together with Point-Of-Sale. You use PART-FINDER to look up parts and Point-Of-Sale to sell them. With PARTFINDER to look up parts and Point-Of-Sale to sell them. With PARTFINDER to look up parts and point-Of-Sale to sell them with manufacture catalogs." L0124897. Changing catalogs is described at L0124922. Therefore, J-CON included a collection of catalogs.	To the extent that ePlus reads the limitation to be met by Lawson's accused system, i.e., that the ability to search for products of specific vendors is sufficient, then the limitation is also met by J-CON and Lawson's prior art system. Searches may be limited to a particular manufacturer. "You might want to search for InterChange parts by manufacturer you car select one or more manufacturers to search by manufacturer press Mfgs or Enter to leave the GROUP field blad and go to the MFGS TO SEARCH field. Then enter the codes of the manufacturers whose InterChange catalogs you want to search." L0123624.	
ASSERTED CLAINS DEPEN maintaining at least two products catalogs on a maintaining at least two products catalogs on a database containing data area and multiple catalogs in electronic format. (L0127571, L012652 & L012661-182). As items are added to the Item Master Record, respective sources: associated with the high cross associated with the sanctional catalog associated with the sanctional catalog associated with the sanctional catalog associated with searching by entering a CATALOGUE ID's. (SAP_083522.) Believing the product catalog to search, user to select a particular product catalog to search user to select user to select user to search user to select user to search user to sel	œ.	J-CON (per supplemental invalidity defenses)			
Maintaining at least two products catalogs on a database containing data areacistic sources; associated with the respective sources; catalogs to search; 28b	Α	Shamos Opinion re P.O. WRITER	To the extent that ePlus contends that this limitation is met by Lawson's accused system, i.e., that restricting a search by vendor number constitutes searching a "separate portion," this limitation is also met by P.O. Writer and Lawson's prior art system. P.O. Writer and Lawson's prior art system. P.O. Writer and Labase (electronic format): "Bayless Stationer publishes a catalogue of office supplies they sell. A very small portion of this catalogue has been pre-loaded in the sample data base." L0126575. P.O. Writer accommodated catalogs of multiple vendors."You can now buy this item from Best Buy, Bayless, or any other vendor you would like to select." L0126552. The P.O. Writer database could be searched by vendor number, indicating a portion to be searched separately: "Since you haven't received a response from Bayless yet, order from Best Buy: - in the Vendor Number field, type 12345 [ENTER]:" L0126552.	Catalogs were published by vendors: "Bayless Stationer publishes a catalogue of office supplies they sell." L0126575 P.O. Writer enabled a user to select a particular product catalog to search using the CATALOGUE ID (a "vendor identification code"). L0126501 & L0126944-46. The system may contain multiple CATALOGUE ID'S. SAP_083522. P.O. Writer accommodated catalogs of multiple vendors: "You can now buy this item from Best Buy, Bayless. or any other vendor you would like to select." L0126552. See also '516 1d.	
ASSERTED CLAIMS DEPEN maintaining at least two products catalogs on a database containing data areacisting to tierms associated with the respective sources; selecting the product catalogs to search; 28b catalogs to search;	7	P.O. WRITER (per interrogatory responses and	ase for storing It. (L0127571, ter Record, catalog can be CATALOGUE may contain 083522.)	P.O. Writer discloses an interface which enabled a user to select a particular product catalog to search using the CATALOGUE ID. (L0126501 & L0126944 46).	
	DEPEN		28a		
149	ASSERTED CLAIMS		maintaining at least two products catalogs on a database containing data associated with the respective sources;	selecting the product catalogs to search;	

ASSERTED CLAMS Comparison	Cas	se	3:09-cv-00620-REP Documer	nt 530-8 Filed 12/14/10 Pag e 34 of 36 PageID# 14
ASSERTED CLAMS CPC Part	Shamos parinjan to L COM	Shamos opinion re J-CON	"The Part Index is an alphabetized list of parts that gives each parts group and subgroup. There are two ways to find part in the Part Index. Press Index at the GROUP SUBGROUP or SELECTION field. At SEARCH FOR enter part or all of the part name. The more letters you enter the more accurate the search wall be. At the GROUP SUBGROUP or SELECTION field type the first 1-4 letters of the part name and press Index. Whichever method you use J-CON displays the index page for parts beginning with the letters you entered. The group and subgroup or subgroups are to the left of the part name." L0123609.	The reference discloses transferring data relating to selected matching items to a requisition program: "When you return to proint-Of-Sale from PART-FINDER, J-CON automatically places all parts you selected with PART-FINDER on a ticket." L0124919. The ticket causes a requisition for parts needed by a customer the begenerated (built) when the ticket is finalized: "Only when the held ticket is finalized does J-CON process it." L0124797. See also '172 1e, '683 3d.
ASSERTED CLAINS DEPEX ASSERTIED CLAINS DEPEX P.O. WRITER (per interrogatory responses and sharmon selected from the control of the control	K I CON trac curdamental invalidity defenses	J-CON (per supplemental invalidity defenses)	J-CON included a search program for matching items in a database in response to the descriptive information entered by the user. (L0123472).	
ASSERTED CLAIMS DEPEN BONGTHER (per interrogatory responses and searching for matching product catalogs, according to matching product catalogs. Building a requisition with a selected matching terms among selected product catalogs by entering product catalogs. Building a requisition with a selected matching terms among selected product catalogs by entering product catalogs. Building a requisition with a selected catalogs can be search or matching terms among the selected catalogs can be search by entering terms associated matching terms from the catalog screen can be selected for requisition by pressing F7. (LOIZE948) The selected matching terms from the catalog screen can be selected for requisition by pressing F7. (LOIZE948) The selected matching terms from the catalog screen can be selected for requisition by pressing F7. (LOIZE948)			h program, L0126941-5. ing the be located, JE ID. nown. e.g., at ing the ing the ing the ing the sar Files, what you buy, buying, etc. files is used	
	D WDITED (nor intermodent reconnece and	P.O. WRITER (per interrogatory responses and	P.O. Writer enabled a user to search for matching items among selected product catalogs by entering search criteria, including item number, item description, and commodity code, that at least partially describes a desired item. (L0127525 & L0127528). The selected catalogs can be searched by ITEM NUMBER, ITEM DESCRIPTION, COMMODITY (CODE, or a portion of these criteria.	
	DEPEN DENCY		78c	78d
151				

- Case 3:09-cv-00620-REP Decumer	t 530-8 Filed <u>1</u> 2/14/10 Page 35 of	36 <u>.₽ageID# 14</u> 3
Shamos opinion re J-CON J-CON generated multiple purchase orders from a single requisition. "The purchasing programs enable you to quickly orders based on your real needs." L0123423. "You can set up J-CON to automatically compute POs during EOD. You can also set it to automatically transmit POs to vendors who use A-DIS. The POs can go to primary and alternate vendors and to other vendors for whom you have set up PO control files in Function 7.7." L0123693. Generation of multiple purchase orders is disclosed beginning at 1.0123695, e.g.: "When you compute a PO for primary or alternate vendor J-CON checks each manufacturer to see which ones should be ordered from the vendor. It then checks every be ordered." See also '1721f.	onsolidated or split automatically." To the extent ePlus accuses Lawson's system The J-CON system located interchangeable part from The J-CON system located interchangeable part from The extent ePlus accuses Lawson's system The J-CON system located interchangeable part from The J-CON system located interchangeable part from The J-CON system located with a "competitive with other computer systems that don't use the same amountacturer codes, sublines or pricing codes that you use. For example, your serving warehouse might use the manufacturer conversion table converts the warehouses code to shows a purchase order history screen listing offerent catalog numbers (first column) for the same firm number (A1000) as listed by and Bayless. In order to produce this screen. P.O. Writer must possess the claimed "determination or specific and default." In order to produce this screen. P.O. Writer must possess the claimed "determination or page L0126552, showing catalog numbers for items that are generally equivalent. Cross-referencial models are competitive with another system, J-CON uses the default conversion table." L0124152. The part of the required table is shown in the table at L0126552.	J-CON had a sophisticated system for keeping track of equivalent items, dividing them into "Replaced Parts," "Substitute Parts," and "Can-Use Parts," L0123551. Furthermore, "Atternate Parts" and "Primary and Atternate Manufacturers" are disclosed at L0123613. A number of different methods of converting among item numbers is disclosed. Substituting an alternate part is described, e.g., at L0124837.
J-CON (per supplemental invalidity defenses) J-CON could be configured to process purchase orders manually or automatically. (L0123693-99).	The J-CON system located interchangeable part from different catalogs are associated with a "competitive part number" in the cross-referencing module InterChange. (L0123625).	
er the same and th	consolidated or spir automatically." Lo126966. To the extent ePlus accuses Lawson's system of possessing this element, i.e. through the use of UNSPSC codes, the reference and Lawson's prior art system also disclose the element. This element is disclosed at L0126552, which shows a purchase order history screen listing different catalog numbers (first column) for the same item number (A1000) as listed by different vendors, e.g., Best Buy and Bayless. In order to produce this screen, P. O. Writer must possess the claimed "determination system." An example of the required table is shown on page L0126552, showing catalog numbers for items that are generally equivalent. Cross-referenced items and identical items are shown in the table at L0126552.	"converting" and "substituting" have been construed to be synonyms. Therefore, see also '683 3f ("means for converting")
P.O. WRITER (per internogatory responses and P.O. Writer enabled a purchase order to be created from the requisition list by pressing F4. (L0126950). Requisitions including items (L0126950). Requisitions including series split into different purchase orders by vendor. (L0126976).	During Purchase Order generation on the P.O. Writer system, the vendor listed on the requisition could be automatically converted to different uvendors. (L012976-80).	
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ASSERTED CLAIMS processing the requisition to generate one or more purchase orders for the selected matching items; and	converting data relating to a selected matching item and an associated source to data relating to an item and a different source.	
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σ :	Shamos opinion re J-CON	"In POS you can check a stocking part's available quantity, stock quantity, and price levels With inventory inquiry, you can check stocking parts prices and availability." L0125060. The steps of determiningw whether a matching item is in inventory are shown at L0125060. See also "Warehouse inquiry" at L0125061. "JIF Inquiry gives you inventory information about parts in your JIF. You begin JIF Inquiry by pressing JIF Inquiry from any field on the POS screen except WRKSTAT." L0123450. "Warehouse Inquiry gives you inventory information about parts at your serving warehouse. You begin Warehouse Inquiry by pressing <whse inquiry=""> from any field on the POS screen except WRKSTAT." L0123451. Inventory inquiry is described infetral starting at L0123541.</whse>	Claim 29 is anticipated by J-CON.
Δ.	J-CON (per supplemental invalidity defenses)	The J-CON system enabled a user to determine whether and how many of a particular item was available in stock. (L0123608 & L0123612).	The J-CON system renders claim 29 obvious when combined with the other cited prior art references as described with respect to claim 28.
Α	Shamos Opinion re P.O. WRITER	"The Inventory Control Module allows you to track on-hand Inventory balances capture and report usage history and automatically generate Re-order Analysis as often as you like." L0126633. The Inventory Control module is the subject of an entire manual at L0126148-395.	
	P.O. WRITER (per interrogatory responses and	P.O. Writer included an inventory Control Module that enabled tracking of on-hand inventory balances. (L0126633).	
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ASSERTED CLAIMS		29. The method of claim 28 further comprising the step of determining whether a selected matching item is available in inventory.	
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